Submission Number: ***MBTL-SEPA-DEIS-0002424***

Received: 6/9/2016 6:25:50 PM
Commenter: Joe Micheletti
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. As a 5th generation Montanan, this means a lot for Montanan jobs. Harvesting our natural resources in a responsible providing jobs all the while protecting our outdoor way of life. Thanks for considering my comments.

Submission Number: ***TRANS-PASCO-M2-00014***

Received: 6/2/2016 12:00:00 AM
Commenter: Michelle
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Good afternoon. My name is Michelle, and I live in Pasco, Washington.

I have a few comments that have led up to what some have thought is a choice between jobs and pollution.

Al Gore declared only a significant fraction of climate change in our global warming crisis and the debate is over. Yet (inaudible) revealed that 53 percent of scientists actively involved in global climate did not believe man caused global warming had occurred, 30 percent weren't sure, and 17 percent were thinking maybe. So 2,500 scientists thought it did, 10,000 said it did not.

It has not been satisfied and even MIT and NASA have said it's still something we're discussing, but there is not a lot of proof of that. In fact, some of it is caused by the Earth's motion around the sun over time.

I'd like to give a few reasons besides the jobs. What it will do to benefit Taiwan, Japan, and South Korea who actually burn coal cleaner than we do. It was mentioned earlier that this coal is being burned and polluting where people have to wear a mask. That's not true. It's their manufacturing which should have been bargained for with Mr. Obama and that nation. It didn't get done. So it's not the coal that's causing the problem. They've gone to great efforts to lower the dust.

We've got four states, Utah, Colorado, Wyoming, Montana, in addition to Washington that will benefit from this. Let me tell you what happens to poor people. Most of their -- a higher percentage of their income goes to energy. So rising prices, if we don't keep coal and some of these in play along with the wind mills that cost a million dollars apiece, then we're going to threaten the very poor. They're the ones that are going to lose. It's like a progressive tax, and they're taxed at a higher rate than the rich that are so often claimed -- thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002604***

Received: 6/13/2016 11:16:20 AM
Commenter: Donald Miholovich
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000496***

Received: 5/19/2016 11:42:32 AM
Commenter: Gajus Miknaitis
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing in opposition to the proposed terminals. The environmental impacts outweigh the economic gains. Expanding fossil fuel infrastructure threatens our communities' and local environments' health and safety in numerous ways directly. Less directly, bringing more fossil fuels to market only accelerates climate change, a problem with serious impacts at home and around the world. Given what we know about climate change at this point, I believe the impacts make it morally wrong to continue to expand the fossil fuel industry. Please do not approve this project.

Submission Number: ***TRANS-LV-M2-00058***

Received: 5/24/2016 12:00:00 AM
Commenter: Jose Milani
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi, my name is Jose Milani (phonetic). I am against the coal terminal and coal burning into fossil fuel, and it should stay in the ground. We don't need coal trains clogging up the road, polluting our rivers. Wind turbine and solar power is the way to go. China makes solar panels. They should import and export worldwide instead of polluting our world.

Children are our future. With coal export -- I love my children and grandchildren. With coal coming to the Port of Longview and on the sides of the Columbia River, it doesn't make a promising future for our children. No action alternative.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☑ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☑ Greenhouse Gas
- ☑ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

Little is said in the DEIS or today's testimony about the value of unburned coal. However much there is of it must last forever, for a conceivable civilization here in 1000 and 2000 years. It is valuable for raw material purposes, for eventual fuel use, for metals smelting. We must learn to think 1000 years ahead. So, burning Powder Basin coal now, here or in Asia is simply insane. Add in the greenhouse gas impacts of that burning in an era of well demonstrated, anthropogenic

(additional space is provided on the back)

(comment continued)

climate warming, and the level of this madness becomes utterly unsupportable. Denial of ANY AND all permits for the Millenium coal terminal at Longview is the only acceptable conclusion for Cowlitz County and the Washington State Department of Ecology.

Charles B. Milla Ph.D.
1370 NW 30th St.
Corvallis, Oregon 97330

(Written 24 april 2016 at Longview, WA, during the Millenium Terminal DEIS hearing.)

I also checked rail transport. Present rail systems on both sides of the Columbia are utterly inadequate for the proposed movement of approximately 44,000,000 tons of coal annually.

C. M.

Submission Number: ***MBTL-SEPA-DEIS-0003346***

Received: 6/13/2016 9:21:51 PM
Commenter: Erika Millage
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Please protect the Pacific Northwest and the rest of the world and deny the permits for the coal terminal. We need more clean energy and not dirty coal.

Millard, Troy (1081)

Submission Number: ***MBTL-SEPA-DEIS-0001081***

Received: 5/24/2016 7:00:59 PM
Commenter: Troy Millard
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! Thank you for accepting comments for this important proposal. The Millennium project will do a great deal for the economic outlook of this country. Let's get Americans back to work!

Submission Number: ***MBTL-SEPA-DEIS-0001961***

Received: 6/6/2016 2:10:27 PM
Commenter: Troy Millard
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete, it’s time for progress. Regulators have been looking at this project for years, and it’s time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments â€" it’s time to let it. Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

Submission Number: ***MBTL-SEPA-DEIS-0001775***

Received: 6/2/2016 4:56:09 PM
Commenter: Dave Millem
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

In a time that has included seeing neighbors and friends out of work and under-employed, we need to encourage economic development. In my opinion, that cannot happen soon enough. That is why I am writing today. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it’s time Longview went back to work. Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on Millennium’s application.

June 13, 2016

Elaine Placido
Director, Building and Planning
Cowlitz County
207 4th Avenue North
Kelso, Washington 98626
PlacidoE@co.cowlitz.wa.us

Sally Toteff
Director, Southwest Regional Office
Washington State Department of Ecology
300 Desmond Drive SE
Lacey, Washington 98503
Sally.toteff@ecy.wa.gov

RE: Millennium Bulk Terminals - Longview Coal Export Terminal
Comments on Draft Environmental Impact Statement (Draft EIS)

Dear Dr. Placido and Ms. Toteff:

Thank you for the opportunity to submit comments on the April 29, 2016 Draft Environmental Impact Statement (Draft EIS) for the Millennium Bulk Terminals - Longview (MBT-Longview) Coal Export Terminal project (Project). Publication of the Draft EIS is a critical milestone in the permitting process. We are pleased to have reached this point in the process and anxiously await the completion of the Final EIS.

The Washington State Environmental Policy Act (SEPA) designates the Department of Ecology with the duty and function to assure that environmental impact statements (EISs) are "simple, uniform, and as short as practicable. EISs are required to analyze only reasonable alternatives and probable adverse environmental impacts which are significant, and may analyze beneficial impacts."[1] After four years of study, the 828-plus page Draft EIS [2] found only one unavoidable and significant adverse impact that would be directly caused by the Project--namely, demolition of the remains of the Reynolds Aluminum

[1] RCW 43.21C.110(1)(d)
[2] Ecology's SEPA Rules also require that the EIS be limited to one hundred and fifty pages, maximum. See WAC 197-11-425 (4). Ecology's DEIS alone is 827 pages which exceeds their own regulations by 500%. The DEIS with all appendixes totals 3927 page.

Plant. Voluntary mitigation for this impact has already been identified with appropriate federal, state, and local agencies, including the Washington Department of Archeology and Historic Preservation. The mitigation measures are expected to be documented before the Final EIS is published. Completion of this process will reduce the impact of demolition below a level of significance, and the Final EIS should reflect this change.

No ***direct*** unavoidable and significant adverse impacts from constructing or operating the Project were found for the other elements of the environment, including coal dust, water quality, surface waters, groundwater, wildlife, fish, natural resources or air quality.

The scope of the EIS was significantly expanded to include eight elements identified in the Draft EIS as having ***indirect*** impacts that could be unavoidable and adverse. Those indirect impacts result from activities within a global coal supply chain that are clearly outside the control of MBT-Longview. These indirect impacts result from trains and vessels using existing rail and navigation corridors, or the combustion of coal in Asia by its Asian end-users. These alleged impacts are speculative, are not proximately caused by the Project, and lack the required disclosure of substantial uncertainty in linking the alleged impacts to the Project.

With this letter, MBT-Longview submits substantive comments on the Draft EIS. Our letter includes a summary of comments, followed by a summary of the legal framework that an EIS issued pursuant to the State Environmental Policy Act (SEPA) must follow, and concludes with specific comments on the DEIS's approach in specific "study areas." A more detailed discussion of the legal framework for SEPA analysis is included as *Attachment 1*. We have identified technical corrections to the Daft EIS text in the form of suggested text revisions, and these are included in a table included as *Attachment 2*. *Attachment 3* includes a technical analysis of Columbia River Zone 6 fishery resources, and *Attachment 4* includes technical reports and memoranda on greenhouse gas (GHG) emissions.

A. Summary of MBT-Longview's Comments

- Publication of the Draft EIS and completion of its accompanying comment period are critical milestones in the permitting process. Given the thoroughness and extensive nature of the Draft EIS, it should not require substantial effort or time for the co-leads to complete the Final EIS. We see the comprehensive nature of the Draft EIS as providing the opportunity to make up for lost time and publish the Final EIS before the end of 2016.
- MBT-Longview agrees with the co-leads no ***direct*** unavoidable and significant adverse impacts related to coal dust, water quality, surface waters, groundwater, wildlife, fish, natural resources or air quality will ensue from the construction and operation of the Project, with the exception of impacts resulting from the demolition of 1968-era Reynolds Aluminum smelter buildings,
- MBT-Longview agrees with the co-leads that the operation of the Project will not (i) result in coal dust or emissions that exceed Washington's stringent air quality standards; and (ii). will not affect the quality of drinking water or surface waters.

Unprecedented and Expansive Scope

- The Draft EIS departs from long-established SEPA precedent by analyzing effects that are not causally related to MBT-Longview's Project and that improperly focus on the commodity being shipped, instead of the act of transloading material from trains to vessels. MBT-Longview applied for permits to construct and operate a transloading facility on an approximately 190-acre site. A standard SEPA analysis would have focused on the property for which permits were requested and the immediate surrounding area. Had this Project been evaluated under the rules applied to other straight-forward port development projects, the Draft EIS would have concluded that many of the so-called identified project indirect effects would have occurred in the absence of the Project (*i.e*. under the "No-Action Alternative"), while the remaining true Project impacts can be readily mitigated or would not occur anyway.

- The Draft EIS addresses alleged indirect impacts that may result from the operation of trains or vessels in existing rail and shipping corridors, or the combustion of coal in Asia by the end users of the commodity that would be shipped overseas from the MBT-Longview terminal. The studied impacts are speculative and lack the required disclosure of substantial uncertainty in linking the alleged impacts to the Project.

Unprecedented Transportation Scope of Review

- The Draft EIS acknowledges that with or without the Project, rail operations will double in the next 20 years and thereby reach capacity. Nonetheless, the Draft EIS improperly concludes that the Project will result in significant impacts from increased train traffic by focusing on the immediate future, instead of the long-term 20-year temporal approach used by the WSDOT 2013-2035 Rail Plan on which the Draft EIS capacity analysis was based. The difference between the State Rail Plan capacity forecast and the capacity forecast in the Draft EIS is one of timing, which has never previously been a significant adverse impact requiring analysis under SEPA.

- The DEIS estimates that projected rail traffic will require increased capacity created through changes in operation and capital investments by the railroads. The DEIS acknowledges that the railroads traditionally make these improvements-a point underscored by the letter from BNSF Railway's CEO to then-Washington Governor Chris Gregoire.

- As a result of the Columbia River Channel Deepening Project, surplus capacity exists to accommodate the vessel traffic resulting from Project operations. Vessel traffic has declined in the reach of the Columbia River that would be used by vessels accessing the Project docks. Attracting additional vessel traffic was the community's goal when it succeeded in obtaining over $180 million in public funding to deepen the river shipping channel. Even at maximum operation, the number of vessels serving the proposed docks, when combined with other current and projected vessel traffic, would be similar to historic operations that existed twenty years ago.

Unprecedented Greenhouse Gas Scope of Review

- The Draft EIS engages in an unprecedented geographic scope of review of GHG emissions by attempting to forecast the price and demand of coal, not just in the United States, but across Asia.
- Forecasting commodity and energy market demand is inherently speculative over the short-term, let alone over the course of 20 years. If such forecasting could be accomplished with the degree of "reasonable foreseeability" that SEPA demands, then the commodity- and energy-markets would offer a relatively safe haven for investors and far less opportunity to profit from derivatives, arbitrage, and speculation on commodity futures. It is simply not possible to accurately ascertain what will occur in energy and commodities markets in the near term, much less over the course of a multi-decade time period.
- Of the four scenarios used to predict probable GHG emissions, the Draft EIS chose to employ the most speculative scenario, which it predicts will result in a significant increase in GHG emissions. In so doing, the Draft EIS chose not to employ less speculative outcomes based on present day conditions that if selected, would have demonstrated a significant decrease in GHG emissions as a result of the construction and operation of the Project.

Unprecedented Proposed Mitigation

- Applicants cannot be required, and the Draft EIS proposes, to mitigate for speculative GHG impacts created by the combustion of the coal overseas. Even the most aggressive of the GHG regulations proposed by Ecology would not require facilities to mitigate for any impacts beyond state boundaries. Nor has the State Legislature ever contemplated this sort of expansive scope of regulation or mitigation, reaching well beyond Washington State, across the Pacific Ocean and throughout Asia.
- If finalized, the GHG analysis employed in the Draft EIS will violate the Commerce Clause of the U.S. Constitution. These constitutional rights were established to protect the interests of land-locked states such as Wyoming and Montana seeking to move their products to international markets. By proposing to require the Applicant to mitigate for effects resulting from Asian coal consumption and by attempting to regulate effects resulting from federally regulated rail transportation- the Draft EIS runs afoul of well- established constitutional and federal preemption doctrinal constraints.

B. SEPA Legal Framework

A SEPA EIS is intended to evaluate potential significant, adverse environmental impacts, including direct, indirect, and cumulative effects that are reasonably foreseeable and proximately caused by a proposed project.

"Significance" as defined under SEPA means "a reasonable likelihood of more than a moderate effect on the environment" "Impacts" are defined as "the effects or consequences of actions." SEPA requires an analysis of probable *significant* impacts, not every conceivable impact. Ecology's SEPA regulations

establish that "'[p]robable means likely or reasonably likely to occur" and "is used to distinguish likely impacts from those that merely have a possibility of occurring, but are remote or speculative." Accordingly, the Draft EIS should address "only those probable adverse environmental impacts that are significant."

In addition, the Draft EIS must analyze only those probable significant adverse impacts that are proximately caused by the Project and reasonably foreseeable. An EIS is not to consider indirect or cumulative effects that are remote or speculative, or where the chain of causation relies on too many independent actions. To ensure that the SEPA analysis focuses on only those impacts that are proximately caused by the Project, SEPA requires that a "no-action alternative" be simultaneously analyzed in order to distinguish between the significant environmental effects that will be proximately caused by the Project and those impacts that will occur in the event the Project is not permitted.

In addition to addressing "direct" and immediate impacts and those which will occur later in time ("indirect" impacts), SEPA requires that every EIS analyze cumulative impacts. "Cumulative impacts" are "the impacts[s] on the environment which result from the incremental impact[s] of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions." However, if a Project is not likely to result in significant direct or indirect impacts, it cannot result in significant cumulative effects.

As discussed below, the analysis employed in the Draft EIS ventures far beyond these well-established statutory constraints into uncharted territory. The unprecedented and expansive scope of this Draft EIS- which focuses on impacts from the end-use of the commodity being shipped instead of the act of transloading across the docks that MBT-Longview proposes to construct, invites a discriminatory approach to SEPA implementation for unpopular and/ or particularly "controversial" projects. The Final EIS should correct this significant legal error, and refrain from employing this sort of speculative approach and patently invalid geographic scope that goes well beyond state boundaries.

Most, fundamentally, SEPA calls for a simple and uniform approach for impact analysis. Portions of the Draft EIS go well beyond the simple and uniform approach by evaluating potential impacts that (a) are not proximately caused by the Project, (b) are not "likely or reasonably likely to occur" or speculative, and may not happen at all, and (c) may happen whether or not the Project goes forward. In these instances, the substantial uncertainty in these studies was not properly disclosed. The inclusion of potential mitigation measures for impacts that are not proximately caused by the Project invites the agencies to exceed their regulatory authority.

C. Substantive Comments on Specific Elements of the Environment

C.1 Social and Community Resources

Accessibility to Community Resources and Public Services

The Draft EIS draws conclusions about rail impacts that do not rationally relate to the underlying facts established in the document. For example, 0n page 3.2-25, the Draft EIS acknowledges that trains would not adversely impact daily average vehicle delay at public at-grade crossings and that peak-hour vehicle delay would not be affected if track improvements are made. Under these scenarios, access to public services, including emergency response, would not change significantly. The Draft EIS also states that any vehicle delay due to train crossings would be temporary (limited to PM peak hour) and the probability for two trains to pass during peak hour traffic would be low. In considering potential delays to emergency vehicle waiting to cross the tracks, the Draft EIS on page 5.3-26 states that

> *"in a 24-hour period, the Proposed Action would increase the probability of an emergency response vehicle being delayed by 1% at study crossings along the Reynolds Lead, BNSF Spur, and BNSF main line."*

Nonetheless, the Draft EIS concludes in Section 3.2: *Under these scenarios, Proposed Action-related trains would adversely affect the accessibility to community resources and public services at selected public at-grade crossings on the Reynolds Lead, BNSF Spur, and BNSF main line. [see DEIS, page 3.2-25)*

These conclusions are not supported, especially when compared with the Draft EIS's analysis of similar impacts from the "No-Action Alternative. *The Draft EIS on p. 3.2.28 concludes that the No-Action Alternative would not be expected to affect vehicle delay, and therefore, would not affect social and community cohesion and public services.* Given that the No-Action Alternative includes more trains than exist today, the analysis of effects from the Project should reflect a similar low level of impacts resulting from vehicle delay and effect on public services. The description of impacts of the No-Action Alternative in the Final EIS should reflect this impact, similar to the proposed Action.

Train Horns

The DEIS incorrectly states that "all necessary improvements" to convert railroad crossings at Oregon Way and Industrial would be funded by MBT-Longview. The Longview Switching Company (LVSC) is the operational entity for the short line. LVSC intends to upgrade the Reynolds Lead for Class II speeds. Central traffic control (CTC) automation from Ft Worth Operations Center is also required and would be installed by BNSF or others to handle the additional train activity associated with the Project and other development in the industrial area. To eliminate or reduce the need for train engineers to sound their horns at crossings at Oregon Way and Industrial Way, MBT-Longview voluntarily proposed to fund additional improvements to convert these two crossings to quiet crossings. The improvements would include electronics, barricades and crossing gates and would occur as part of the overall upgrade performed by LVSC. MBT-Longview would provide the funding prior to reaching full operation of the

Project. This voluntary mitigation measure is intended to reduce noise impacts to the two neighboring residential communities. Thus, it is not accurate to suggest that the costs of "all necessary improvements" would be ascribed to or funded by MBT-Longview, and that statement should be corrected in the text of the EIS.

The conclusions of the direct and indirect noise impacts on adjacent uses should be revised to reflect the applicable zoning (rather than non-conforming uses). The Final EIS should recognize that the noise emanating from the Project site would be in compliance with applicable noise regulations. For uses that would be allowed under the applicable zoning, Project-related noise would not cause a significant adverse impact.

The Draft EIS concluded that train noise on the Reynolds Lead during Project operation would be significant and unavoidable unless noise measures were put in place. Both the State of Washington and Cowlitz County exempt railroad noise from regulation.

> Chapter 173-60 WAC MAXIMUM ENVIRONMENTAL NOISE LEVELS, WAC 173-60-050 Exemptions. (4) *The following shall be exempt from all provisions of WAC 173-60-040: (c) Sounds created by surface carriers engaged in interstate commerce by railroad.*
>
> Cowlitz County Code Chapter 10.25 NOISE CONTROL, 10.25.050 Exemptions.
> *A. The following sounds are exempt from the provisions of this chapter: 9. Sounds created by the operation of equipment or facilities of surface carriers engaged in commerce by railroad;*

Noise impacts are considered based on the receiving property (the users who will receive or hear the noise). Housing located at California Avenue and Industrial Way is located within an area zoned for Mixed Use Commercial/Industrial. Page 3-19 of the Longview Comprehensive Plan acknowledges that "Housing will more than likely be lost in areas targeted for redevelopment to other uses." Four areas are identified, including "Industrial/California area bounded by Industrial Way, Oregon Way, Tennant Way and 3rd Avenue." The Draft EIS states that there are 44[3] such residences at 3rd Avenue and California Way that would be indirectly affected by the project due to increased noise from train horns. These residences are non-conforming uses.

The No-Action Alternative is required to recognize and account for growth and development to occur in a manner consistent with adopted zoning and comprehensive plans. Non-conforming uses, while they may be legal, are disfavored under Washington law. [4] Thus, the No-Action Alternative should anticipate that over the planning period (which is at least the time for project build out), the land on which these 44 non-conforming uses exist will be redeveloped consistent with zoning and the adopted comprehensive plan. Properly conducted, the Draft EIS would have considered the 44 residences to be

[3] Draft EIS, page 5.5-25, Table 5.5-4.
[4] *Rhod–A–Zalea & 35th, Inc. v. Snohomish County,* 136 Wn.2d 1, 7, 959 P.2d 1024 (1998), and *State ex rel. Miller v. Cain,* 40 Wn.2d 216, 218, 242 P.2d 505 (1952).

replaced as part of the No-Action Alternative. The future use, consistent with zoning, should be used as the basis for determining the noise impacts from trains traveling on the short line. The Final EIS must clarify that the existing uses are inconsistent with the City of Longview's applicable zoning and comprehensive plan designations, and that such non-conforming uses are disfavored under the law. The Final EIS should modify the No-Action Alternative to reflect uses allowed under the applicable City zoning.

On page 5.5-31 of the Draft EIS, the Co-lead agencies have added mitigation measure NV-2 as follows:

> **MM NV-2. Support Implementation of a Quiet Zone along the Reynolds Lead.** *To address moderate and severe noise impacts along the Reynolds Lead due to rail traffic, before beginning full operations, the Applicant will coordinate with the City of Longview, Cowlitz County, LVSW, and the affected community to inform interested parties on the FRA process to implement a Quiet Zone that will include the 3rd Avenue and California Avenue crossings. Public outreach on the Quiet Zone process will include low-income and minority populations. The Applicant will assist interested parties in the preparation and submission of the Quiet Zone application to FRA. If the Quiet Zone is approved, the Applicant will fund all improvements.*

We question the expense of installing quiet crossings in these two locations (3rd Avenue and California Way) for a short-term impact.

As with the voluntary mitigation proposed for Oregon Way and Industrial Way, were MBT-Longview to agree to this mitigation measure, as addressed above, MBT-Longview would fund additional electronics, barricades and crossing gates, not "all necessary improvements". The Final EIS should accurately reflect the various entities' roles in funding these improvements.

C.2 Noise and Vibration

On page 5.5.3 of the Draft EIS, the Co-lead agencies have added mitigation measure NV-2 as follows:

> ***MM NV-1. Monitor and Control Increased Noise from Coal Export Terminal Construction and Operations at Closest Residences.*** *If agreed to by the property owner(s), the Applicant will monitor noise levels at the two residences nearest the project area to detect possible noise impacts from the Proposed Action during construction and operations. Noise will be monitored during construction and until at least 6 months after initiation of operations. The Applicant will submit monthly noise reports to Cowlitz County Building and Planning. If the monitoring identifies a noise impact due to coal export terminal operations, the Applicant will reduce the noise exposure of the receptors with modifications to terminal operations or installation of building sound insulation at the noise receptor.*

MBT-Longview agrees with the proposed mitigation measures involving noise monitoring. This can occur through noise monitoring at the site boundaries, or at adjacent properties should the property owners agree.

C.3 Hazardous Materials

The Draft EIS incorrectly categorizes coal as a hazardous material. The Draft EIS also mistakenly includes a list of chemicals that would be used in an on-site laboratory. MBT-Longview is not proposing to include an on-site laboratory. Coal samples would be collected and sent to an off-site lab for any required testing. Finally, the Draft EIS incorrectly identifies water treatment chemicals and chemical categories that MBT-Longview does not expect to use during normal operations.

The errors noted above are also present in the SEPA Hazardous Materials Technical Report.

The errors are found on Page 3.6-22 of the Draft EIS and emphasized in bold below. Each of the words in bold below, including the description of onsite coal handling, should be deleted from Section 3.6 of the EIS.

> *The following hazardous materials are expected to be used during normal operations of the Proposed Action.*
>
> - *Diesel fuel, gasoline, oils, greases, hydraulic fluids, antifreeze/coolants, and solvents used for equipment operation and maintenance.*
> - ***Sulfuric acid, calcium hydroxide**, flocculants, **lime, and antiscalants** used for water treatment.*
> - ***Chemicals used in the on-site laboratory (generally in small quantities of 5 gallons or less) could include methylene chloride, toluene, acetone, and 2-butanone.***
> - *Wastes classified as hazardous and nonhazardous waste and sanitary sewer waste.*
> - ***Coal handled during facility operations and during transportation***

Coal is not a "Hazardous Material." The Hazardous Materials section begins with the broad definition of hazardous materials found on page 3.6-5. The definition focuses on "contaminated environmental media, dangerous waste, solid waste, hazardous substances and petroleum products" and includes a list of federal and state regulatory programs that define and regulate these hazardous materials. Despite the Draft EIS's page-long definition of hazardous materials, none of the identified programs regulates coal or defines coal as a hazardous substance or a hazardous material. Further, federal and state regulatory definitions *not* included in Draft EIS do not identify coal as a hazardous material. These include the U.S. Department of Transportation's hazardous materials definition found at 49 C.F.R. §171.8 (including the materials designated in the Hazardous Materials Table at 49 C.F.R. §172.101);

EPA's Consolidated List of Lists, dated March 2015 (covering chemicals with reporting requirements under CERCLA, the Emergency Planning and Community Right-to-Know Act and the Clean Air Act); and Washington State's various lists of hazardous substances and hazardous materials. See http://www.ecy.wa.gov/hsieo/hazSubA-Z.html.

Because coal is not a "hazardous material" under the Draft EIS definition of the term, or any other relevant definition of that term, the description of various features of the Project related to coal handling found on page 3.6-23 should be deleted from the Hazardous Materials section and the associated Hazardous Materials Technical Report. Similarly, the water treatment and laboratory chemicals that are mistakenly identified as being used in normal operations should be deleted. The Draft EIS definition of hazardous materials should be made consistent with state and federal definitions.

C.4 Wildlife

The presence of whitetail deer has been disclosed previously and will be considered in detail in the Endangered Species Act (ESA) consultation for the Project. No separate analysis is required for the Final EIS.

C.5 Tribal Resources

Chapter 3.5 of the Draft EIS (Tribal Resources) states that *"[i]n-water construction-related activities would cause physical or behavioral responses in fish."* (EIS pg. 3.5-14) However, the likely magnitude of those physical or behavioral responses is not discussed, and the possibility that permit conditions (e.g., CWA Section 404 conditions) would minimize those effects is not mentioned. The Draft EIS then states that the Project's construction-related impacts *"could affect aquatic habitat, which could reduce the number of fish surviving to adulthood and returning to areas upstream of Bonneville Dam"* where tribal fisheries are present. The same issue is identified for construction-related indirect impacts, again with no discussion of the magnitude of impacts to fish behavior or to the fish themselves: *"Construction-related activities would cause physical or behavioral response in fish or affect aquatic habitat, which could reduce the number of fish surviving to adulthood and returning to areas upstream of Bonneville Dam, thereby affecting the number of fish available for harvest by the tribes."* (Draft EIS pg. 3.5-14,).

The Draft EIS references no studies or other documentation supporting the statement that potential impacts to aquatic habitat or to fish behavior due to Project construction and operation "could" reduce the number of fish available for harvest by tribes. In reality, the impacts to aquatic habitat and fish from the Project would be minor or non-existent and those minor impacts would have no effect on the numbers of fish available for harvest by tribes in the Zone 6 Columbia River fishery. Documentation concerning the lack of impact to fish runs that are harvested in the Zone fishery is provided in Grette Associates' "Analysis of Population-level Impacts on tribal Fish Resources in Zone 6" (*Attachment 3* to these comments).

By discussing unsubstantiated Zone 6 harvest impacts that "could" occur, the Draft EIS inappropriately engages in speculation concerning impacts to tribal fishery resources. For example, and as documented in the attached Grette Associates report, minor changes in fish behavior for any fish present during construction, such as avoiding the immediate vicinity of locations where pile driving is temporarily causing high noise levels, should not result in fish mortality. This is especially true in an extremely large river like the Columbia. In the absence of information demonstrating likely fish mortality from planned construction activities, the Draft EIS should not speculate concerning the possibility that construction-related activities will directly or indirectly result in a decreased number of returning adults and fewer fish available for Zone 6 harvest. Further, Section 3.5.8, which identifies "unavoidable and significant adverse environmental impacts," should not discuss impacts that have not been shown to be likely to occur, and the Final EIS text should reflect this difference.

The Draft EIS should acknowledge that other permitting programs take into account potential impacts to fish and impose conditions that limit those impacts. In this case, many of the fish harvested by tribes in Zone 6 are protected under the ESA, and the Corps of Engineers must undergo consultation with the U.S. Fish and Wildlife Service and NMFS before issuing a permit for in-water work. Permit conditions to ensure that "harm" to those fish is avoided will be added to permits based on this ESA consultation.

Project Operations: Indirect Impacts to Access to Fishing Sites: The Draft EIS improperly attributes to the Project impacts on access to tribal harvest locations along the Columbia River upstream of Bonneville Dam. The Draft EIS concludes that these impacts result from rail operations on the mainline which cause tribal fishers to have to wait to access 20 managed fishing sites on the Washington side of the river (managed by CRITFC[5]), and at an unknown number of unmapped, unimproved access locations. But these impacts result from the No Action Alternative- not the Project. Again, the rail system operating at capacity is, part of the No-Action Alternative. The State Rail Plan forecasts that the rail system will reach capacity without the Project. Thus, impacts on access to traditional fishing sites from the No Action Alternative will be no different from impacts resulting from the Project. According to Table 5.1-5 on page 5.1-15 of the DEIS, the 2028 capacity of the Spokane to Pasco segment of the mainline would be 38 trains per day, and the 2028 capacity of the Pasco to Vancouver segment would be 41 trains per day. The same table estimates that train traffic in 2028 **without the Project** would exceed these capacity figures (56 trains between Spokane and Pasco, and 48 trains between Pasco and Vancouver).

Train operations along mainline rail corridors should be attributed to baseline conditions. The Draft EIS should not attribute impacts from the operation of trains through mainline rail corridors to an individual project. Potential impacts from increased rail traffic on those mainline corridors should be -- and indeed are typically evaluated only when permits are sought to expand rail system capacity.

[5] Columbia River Inter-Tribal Fish Commission

The Draft EIS included a series of "to be considered" mitigation measures that are programmatic rather than site specific in nature. Many are beyond the authority of the applicant to implement, including, for example, the suggestion that the U.S. Corps of Engineers *"could continue consultations with treaty tribes to identify potential impacts and resolve conflicts related to the Proposed Action."* This suggestion amounts to nothing more than additional governmental process measure on top of the anticipated total five-year SEPA and NEPA process that does not directly mitigate any established impacts and could t neither be required through a Shorelines permit nor voluntarily implemented by MBT-Longview. Similarly, coordinating with CRITFC to identify and address access issues is a process suggestion, rather than a mitigation measure. These programmatic measures should be removed from the list of mitigation measures.

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C.6 Air Quality

MBT-Longview agrees with the conclusions of the air quality analysis. However, here are some technical issues that should be corrected in the Final EIS. The split of Direct and Indirect impacts is not correctly applied to a Study Area. Statements such as *"Emissions are aggregated and regulated at a larger scale than a localized study, and therefore direct and indirect emissions are combined"* do not follow standard process for evaluation of air quality. Rail and marine vessel emissions were evaluated beyond the immediate Project area, but the split is not consistently presented.

Several regulatory evaluations were unclear, misleading, or inapplicable. The discussion of toxic air pollutants (TAPs) in Section 5.6.1.2 is over-reaching, implying that all sources will need a full TAPs review. This discussion also includes statements regarding coal dust that are speculative. See discussion of Coal Dust below.

Both the Project and the No-Action Alternative discussed in the Draft EIS use federal conformity de minimis as a reference for acceptable emission levels. Federal conformity is not applicable to this Project. The General Conformity Rule applies to all Federal actions that are taken in designated nonattainment or maintenance areas. This Project is not in nonattainment/maintenance area.

MBT-Longview has proposed that the control efficiency for onsite coal handling be 99%. The current facility permit was modified in 2014 to include a retrofit of coal handling areas with fogging systems. A control efficiency of 99% for enclosure plus fogging was based on vendor information, and was approved by the Southwest Clean Air Agency (SWCAA) during permitting. The Draft EIS, incorrectly employs a 95% efficiency on the basis of a draft permit from Oregon Department of Environmental Quality (DEQ). There is no basis for applying the lower control efficiency due to one draft permit from Oregon DEQ. The Final EIS should use the 99% efficiency rate, which is, expected to be approved by SWCAA.

C.7 Coal Dust

The Draft EIS treats coal dust as a subcategory of air pollution. Applying air quality regulations to this pollutant alone is meaningless, as are comparisons of potential emissions and/or impacts to any federal or State air quality standards. While we agree with the conclusion that coal dust deposition would be minimal, the discussion in the Final EIS should be pared down to describe coal dust, to show how the EIS employed a methodology for assessing coal dust deposition rates, and to describe the results.

The classification and assessment of coal dust as a nuisance is correct, but the analysis in the report is far-reaching for the Draft EIS. There are no federal or State regulatory measures for dust nuisance. On page S-26, regarding coal dust, the Draft EIS states *"A reference standard commonly cited on the question of levels of dust deposition for nuisance and environmental effects is a New Zealand Ministry of Environment study"*. The New Zealand document is entitled: *"Good practice guide for assessing and managing the environmental effects of dust emissions"*. The New Zealand document is not an applicable regulatory standard, and is instead guidance. We also question the basis for the assertion that the New Zealand guideline is *"commonly cited."* The authors arbitrarily chose the New Zealand guideline for 'highly sensitive residential areas', even though there are other guidelines mentioned, including one from British Columbia which shows levels more than twice the New Zealand level for average dustfall in residential areas as acceptable. Nuisance is subjective; the more local, Canadian guideline is better suited, on cultural, socioeconomic, and geographical/climatic levels, to address potential for coal dust *nuisance* in Washington State. Any references to nuisance guidelines within the Coal Dust reports should be clearly marked as *guideline* values, and all adjectives such as 'threshold', 'trigger', 'limit', or the like should be removed.

The Draft EIS is incorrect in comparing coal dust PM10 and PM2.5 impacts (concentration in air) to the National Ambient Air Quality Standards (NAAQS). Impacts from the whole Project were evaluated in the Air Quality report. Breaking out the source type for coal dust can be used to show what percentage of the impact is attributable to coal dust, but should not be evaluated by the standard. A quick assessment of that could have been made just by looking at the apportionment of particulate emissions (coal dust or combustion). The Air Quality report already showed Project impacts meeting the standard, so evaluating a portion of the Project would also show impacts that meet the standards.

C.8 Rail Transportation/Capacity

The Draft EIS errs by attempting to attribute to the Project rail impacts from use of the mainline interstate rail corridor. These impacts should be considered appropriately as part of the No-Action Alternative because they will occur with or without the Project.

MBT-Longview proposes to construct a port facility that will provide a transloading service to customers seeking to export coal. Coal will be delivered to the transloading facility through use of the U.S. freight rail transportation system, just as a myriad of other products and commodities are delivered by rail to port facilities for transshipment. But unlike SEPA reviews for other proposed port facilities, the Draft EIS extends its analysis far beyond the impacts caused by increases in localized train traffic. Instead of limiting its analysis to rail traffic from the main interstate rail line to the Project, the Draft EIS includes an unprecedented attempt to discern impacts caused by the use of interstate rail corridors by future customers desiring to use its services. Rather than identifying Project impacts, however, the Draft EIS dwells on the obvious fact that over time, use of the interstate freight rail system will experience growth in the number of trains as it accommodates the economic growth of the region. But this will happen with or without the Project.

The Draft EIS's mitigation discussion compounds these errors by requiring MBT-Longview to mitigate for the Project's contribution to the previously planned for and entirely expected transportation growth on these interstate rail lines. The rail capacity analysis used in the Draft EIS was based on the WSDOT 2013 – 2035 Rail Plan (State Rail Plan) forecast. The State Rail Plan recognizes that the rail system is intended to serve a wide variety of customers who have no operational control over these interstate rail lines. The Plan also recognizes that the rail system is planned, designed, constructed, and managed to operate at or as near full capacity as market demand allows.[6] The Plan forecasts that these rail lines will face capacity constraints by 2035 as a result of expected economic growth. The State Rail plan also recognizes that a rapid increase in the volume of any particular commodity shipment could create capacity constraints prior to 2035. However, rather than viewing a rapid increase in shipment of a particular commodity as a problem, the State Rail Plan affirmatively anticipates "the Class I railroads (BNSF and UP) and other infrastructure owners will likely address key capacity issues as they emerge." *State Rail Plan at page 39.* In other words, the possibility that the state system will reach capacity constraints more rapidly should not be treated as an "impact" in the Draft EIS because the railroads will be highly motivated to address anticipated system capacity constraints before they become a problem.

The Draft EIS acknowledges- as it must- that rail capacity will be exceeded by 2035 with or without projected increases associated with coal trains. The Draft EIS over-simplified the projection that adding eight trains per day to the rail system would add a total of eight trains to overall traffic. The only

[6] The rail system in Washington State serves freight and passengers as part of a multimodal transportation strategy to provide choices to the potential customers of the rail system and to support economic growth. *See Secretary Peterson's cover letter to the State Rail Plan.*

material difference between the State Rail Plan capacity forecast and the capacity forecast in the Draft EIS is one of timing--i.e., when capacity constraints might be reached. For this reason, the No-Action Alternative should conclude that existing capacity will be reached with or without the Project. The Draft EIS rail capacity analysis acknowledges that the construction and operation of the MBT-Longview Project would NOT exceed existing capacity. The EIS should be revised to acknowledge that the Project simply would not cause a significant net impact when compared to the No-Action Alternative.

The Draft EIS analysis identified that rail system capacity exists for what is projected to be at least 12 more years of growth (until 2028 or earlier depending on the railroad segment) even if the Project is operating continuously at full capacity.

The Draft EIS does not recognize fundamental aspects of the rail system in the United States and the State of Washington--namely, that the railroad is managed to serve customers. Its owners seek to operate it at full capacity irrespective of any specific commodity or demand for access to the railroad system. The State of Washington's own studies forecast that the rail system will reach capacity irrespective of whether the rail system is used to ship coal to a terminal in Washington State.

The Draft EIS's failure to recognize the dynamic nature of rail system management and operations results in an analysis that incorrectly attributes future rail system problems to the Project.

Accordingly, the Draft EIS erroneously concludes that the indirect impacts of trains serving the Project will cause rail capacity to be exceeded at almost all points along BNSF's line in Washington and will delay or block other rail users. If future growth in rail system use results in blockages and delays, those impacts would be caused by a failure in rail system management, not the construction and operation of a single port terminal which plans to use existing capacity. Put simply, potential congestion is not an environmental impact issue; it is a planning issue for BNSF and UP. By its very nature, the rail system is managed to accommodate growth and ongoing economic activity.

The Draft EIS improperly suggests mitigation measures to address impacts attributable to the No-Action Alternative. The DEIS considers potential mitigation that "could include upgrading main track, adding new main track, or extending or adding siding". *See DEIS at page 5.1-24.* However, the trains bound for the Project only represent a portion of total train traffic. A condition that requires mitigation for impacts caused by the use of the existing rail system by others would constitute an unconstitutional regulatory taking. This sort of mitigation requirement lacks the requisite "rough proportionality" and is an unlawful exaction.[7] It is not an applicant's obligation to mitigate pre-existing conditions or the natural expansion of rail use within existing capacity constraints.

Federal law pre-empts any exercise of SEPA substantive authority to address rail capacity constraints and more generally, rail operations on the mainline system. The Final EIS should affirmatively recognize

[7] See Attachment 1 for more detailed discussion on the Constitutional limitations on the exercise of SEPA substantive authority

that the U.S. interstate rail transportation system is managed to function near or at capacity. The Final EIS should state that growth in rail system use, and future increases in rail system capacity, are attributable to the No-Action Alternative rather than an adverse impact attributable to the Project. The Final EIS should also recognize that analysis of the rail system along the mainline in Washington State is for disclosure purposes only. Finally, the Final EIS should acknowledge that the Project will not cause a probable adverse direct or indirect impact related to interstate rail system capacity and therefore need not mitigate for what is more properly described as No-Action Alternative effects.

C.9 Rail Safety

The errors identified above with respect to mainline rail capacity issues are exacerbated in the Draft EIS Rail Safety chapter. Contrary to conclusions reached in the Draft EIS, rail safety impacts from the operation of the existing rail system are not within MBT-Longview's control, will exist with or without the Project and therefore cannot be attributed to the Project.

Any rail safety concerns are the same with or without the Project. The only material difference between the State Rail Plan projection of capacity constraints, and the capacity forecast in the Draft EIS is one of timing--i.e., when capacity constraints might be reached without rail system management by the owners of the system. The corresponding effect on rail safety is that there is no probable significant impact on rail safety caused by the Project for the same reasons addressed above that the Project does not cause the rail system to reach capacity constraints. The Draft EIS and the No-Action Alternative should conclude that the Project will not cause a probable significant impact to rail safety along the rail system as compared to the No-Action Alternative.

The Draft EIS uses an extremely broad and unusual definition of "accident" to include events that are neither significant nor adverse to the environment, and which inflates occurrence rates. For example, the Draft EIS at page 6-40 states: *"A train accident involves one or more railroads that have sustained combined track, equipment, and/or structural damage in excess of the reporting threshold. The FRA reporting threshold was $10,500 in 2015. FRA accident reporting threshold was $10,500 in 2015, which means any incident of $10,500 or more is classified as an accident. Therefore, accidents include a wide a variety of incident types and severities, and are not limited to collisions or derailments."* Using an FRA financial reporting threshold as a significance threshold is improper because it skews the incident rates of so called significant adverse impacts. The Final EIS should use thresholds of significance that effectively narrows the incidents that are properly labeled as "accidents." This requires that the Final EIS refine and narrow the definition of an accident as applied in the Draft EIS to those accidents that may actually be significant adverse impacts. This does not require a new analysis, only a refinement of the existing forecasts, which must be applied to the No-Action Alternative in relation to the projected growth of the rail system and the forecast that the system will reach capacity by 2035 with or without the Project.

Further, the Draft EIS improperly aggregates crossing incidents to create total per-day crossing times to indicate a significant adverse impact. Each crossing event functionally has the same crossing time as the current conditions, regardless of growth in the use of the system under the No-Action Alternative. Simply put, the Draft EIS erroneously aggregated the crossing times of individual crossing events to suggest a higher per-crossing risk. The Final EIS should correct this error and the resulting erroneous conclusion. The Final EIS should reject the aggregation of the time of individual crossing delays as a method of impact analysis resulting from a single crossing delay. An increase in the number of individual crossing delays per day does not change the delay time of any single crossing delay.

The Final EIS should state that because the time of individual crossing delays is not altered by the Project, the Project does not cause a significant adverse impact. The Draft EIS appears to have used the percentage increase in rail traffic and applied that factor to rail safety. "*The predicted accident frequency would increase over baseline conditions in 2028 by approximately 22% in Cowlitz County and Washington State with trains related to the Proposed Action."* (page S-31) A 22 percent increase in the rate of accidents, even if properly attributed to the Project, would still result in a very small number of new events compared to existing accident rates. This is another example of an improper aggregation of events over time and is not a probable significant adverse impact caused by the Project.

In any event, the accident statistics used in the Draft EIS do not establish that rail accidents are a significant problem, or that the chance of future accidents is an impact that could be properly attributed to the Project. For example, the Draft EIS establishes that "*cased on FRA data, there were two accidents in Cowlitz County in 2014, and neither involved an injury or fatality. One incident was in a rail yard with no derailment and the other involved a derailment of 11 cars on main line track.*" (Draft EIS, page 5.2-5). It goes on to state that "*in Washington State, there were 36 accidents in 2014, two of which involved an injury. Thirteen accidents were on main line track, and the remainder was in rail yards or on industry track. Derailments (main line and industry track) involved between 0 and 11 rail cars."* (Draft EIS, page 5.2-5).

The Final EIS should clarify that the fact that trains traveling to and from the Project will be carrying coal instead of some other commodity has absolutely no bearing on the rate of accidents or on rail safety more generally. The Final EIS should affirmatively declare that the Project does not cause a significant adverse impact in relation to rail safety.

C.10 Vessel Transportation

In 2010 the State of Washington joined the U.S. Army Corps of Engineers and the State of Oregon to invest over $183 million to deepen the Columbia River navigation channel to a depth of 43 feet. The purpose of this Project was to enable the river system to move more tonnage, even with the decrease in shipping noted in the Draft EIS. Information provided by the Columbia River Bar Pilots shows that the number of bar crossings has decreased by approximately 27 percent in the last 34 years, from 4,751 crossings (2,376 ships) in 1979 to 3,448 crossings (1,724 ships) in 2013. According to information

submitted to the Washington Energy Facility Site Evaluation Council for the Tesoro Savage Vancouver Energy Distribution Terminal (Application for Site Certification Agreement (SCA), August 2013, page 4-424): "*The number of deep draft vessels entering the Columbia River system has declined markedly over the past two decades. There were an average of 2,100 vessel transits[8] between 1995 and 2000; consisting of 1,930 cargo and passenger vessels (92 percent of total vessel entries) and 170 tanker vessels (8 percent of total vessel entries). Approximately 60 percent of these transits occurred at Oregon ports and 40 percent at Washington ports. During 2011 and 2012, there were an average of 1,414 vessel entries; consisting of consisting of 1,326 cargo and passenger vessels (94 percent of total vessel entries) and 88 tanker vessels (6 percent of total vessel entries). Approximately 51 percent of these transits occurred at Oregon ports and 49 percent at Washington ports.*

The number of transits declined from 2,100 (average 1995 to 2000) to 1,414 (average 2011 and 2012), which represented a decrease of 687 vessel entries. This included a decrease of 604 cargo and passenger vessels and 83 tanker vessels. The number of vessel entries decreased by 33 percent. This primarily occurred as a result of increased average vessel size. The average load per vessel increased from 16,658 tons (average load of vessels from 1995 to 2000) to 27,826 tons (average load of vessels for 2011 and 2012), which represents an increase of 67 percent. These changes reflect the increased loads that can be moved on the Lower Columbia River as a result of the channel deepening from 40 feet to 43 feet which was completed in November 2010."

Page 4-431 of the Tesoro Application for Site Certification states: "*Information from the Columbia River Pilots indicates that the number of inbound vessels (1 transit) varied from as low as 1,404 vessels in 2009 to 2,086 vessels in 2000. 2012 data indicated a total of 1,474 vessels*."

Table 5.4-7 of the Draft EIS (page 5.4-19) provides a tabulation of large vessel transits in the study area for 2004 – 2014. For this time period, vessel traffic peaked at 3,858 transects in 2007, and is reported at 3,638 in 2014. The numbers show a minor decrease in shipping volumes, less than 0.1% per year.

Despite the differences in the data, it is clear that vessel traffic has declined in the reach of the Columbia River that would be used by vessels accessing the Project docks. The data show that demand on the river system has fluctuated significantly over the years; river shipping traffic cannot be forecasted in future years with any level of reasonable probability. Forecasting future river traffic is a fundamentally speculative endeavor. It can be reasonably expected that at some time in the future ship traffic may return to historic levels. The data show that, if historic shipping levels return as a result of the Project, such an increase would not present capacity constraints. The Draft EIS should have concluded that the Project would not cause a probable significant impact to the navigability of the Columbia River, or its use as an interstate and foreign commercial transportation channel.

[8] The Tesoro information is based on a transit being a single trip on the river. One ship-call requires two transits.

The No-Action Alternative did not properly account for anticipated growth, similar to the errors found in the rail transportation analysis. Market-driven fluctuations in vessel traffic on the Columbia can be anticipated to occur over time whether or not the Project is ever permitted. Indeed, the No-Action Alternative assumes growth in river traffic, such as that anticipated to result of the Project. Under traditional vessel traffic modeling, a projected future growth factor would anticipate new development on the River, such as that proposed by MBT-Longview. The Draft EIS errs in increasing the anticipated future growth number by *adding* traffic generated by the Project, and attributing that expected growth to the Project.[9] As shown on page 5.4-35 of the Draft EIS: "*The Proposed Action would load 70 vessels per month or 840 vessels per year, which would equate to 1,680 vessel transits in the Columbia River*." Table 5.4-1 4. *Existing and Projected Large Commercial Vessel Traffic in the Lower Columbia River*, page 5.4-39 of the Draft EIS, identifies future No-Action Alternative (2028) traffic at 4,440 trips per year, and Proposed Action (2028) at 6,120 trips, a difference of 1,680 vessel transits. The Draft EIS thus improperly assigns all new trips associated with the Project to the proposed Action rather than as a natural growth factor that would occur with or without the Project. Table 5.4-9 (page 5.4-29) shows an anticipated growth in vessel traffic to 4,440 transits in year 2028 without the Project, and 6,120 with the Project. The result is to over-estimate Project impacts. As with the rail transportation, the only material difference between the forecasts on vessel river capacity with and without the Project is one of timing-when possible river capacity constraints might be reached without river system management by the Columbia River Pilots. As discussed below in Section B.12 Cumulative Impacts, we question why some or all of the vessels transits associated with the MBT-Longview Project would not be accounted for in the vessel traffic baseline.

Accordingly, the Final EIS should conclude that vessel traffic rates will be generally the same, with or without the Project and that any nominal differences resulting from the Project do not rise to a level of "significance" within the meaning of SEPA. Consistent with the above, the Final EIS should clarify that river traffic as a result of the Project will not reach capacity constraints. In short, the Final EIS should conclude that the Project does not cause a significant adverse impact to the navigability of the Columbia River, the function of the Columbia River as a system of commerce (both interstate and foreign commerce), or the capacity of the Columbia River System. The Final EIS should state that analysis of the shipping on the Columbia River was for disclosure purposes only.

C.11 GHG and Climate Change

I. Overview

The Draft EIS's treatment of GHG emissions attributable to the Project is laden with factual and legal errors. Its attempt to forecast energy consumption and commodity market behavior across Asia and the U.S. over a period of 20 years is fundamentally speculative and legally and technically unprecedented.

[9] *See* comments submitted by the Pacific Northwest Waterways Association dated October 25, 2013.

These errors cannot be overcome by additional analyses or information, refined assumptions, or increased technical rigor.

The Draft EIS, which already discloses the potential range of future conditions, cannot be made any more reliable. Refining assumptions or updating information in the analysis today may add greater precision in outputs, but there is no basis to conclude those outputs are a more accurate reflection of future market behavior over 20 years. As a result, additional analysis will not add any more reliability or confidence in a 20 year forecast than an investor could expect the commodity futures-market to predict with "reasonably foreseeability" where coal prices and demand will be in 20 years.

The Final EIS should recognize this limitation and apply SEPA's rule of reason to accord the appropriate weight to the GHG analysis: i.e., given the inherent uncertainty in forecasting how commodity and energy markets will behave over 20 years, no projection of incremental changes in coal use that might be caused by opening an export terminal on the Columbia River can legitimately be considered "reasonably certain" to occur and there is no basis to exercise SEPA substantive authority.

To the extent the Ecology believes that long-term forecasts of incremental GHG emissions are necessary for the Final EIS, the analysis should be provided for disclosure purposes only. And to the extent Ecology feels the need to identify a scenario from the four provided that is more likely to occur, it should select the 2014 Scenario or the Low Bound Scenario as the most probable, for the reasons discussed below.

The Final EIS should abandon any conclusion that the Project would be the proximate cause of (a) environmental impacts in Washington State, or (b) a significant level of emissions. Rather, the Final EIS should adopt the conclusion in the Draft EIS that climate change impacts to Washington State will be the same with or without the Project. This conclusion is supported by scientific evidence and case law that project-level emissions cannot be shown to cause environmental impacts that would not otherwise occur in the No Action Alternative. Furthermore, the Final EIS should abandon its attempt to use laws and guidance having no regulatory bearing on the Project to establish a *de facto* level of significance for GHG emissions. As discussed in detail below, any exercise of SEPA substantive authority to impose GHG mitigation would violate SEPA and the U.S. Constitution.

The Final EIS should, therefore: acknowledge that it is not possible for GHG emissions related to the Project to be the cause of a discernable and new environmental impact in Washington State that would not otherwise occur; acknowledge that there are no laws or regulations that govern the level of GHG emissions attributed to the Project that could serve as a basis for a finding of significance; and eliminate any proposed GHG mitigation requirements for the Project.

II. The GHG and coal markets analysis are inherently speculative and are based on faulty assumptions

Forecasting commodity and energy market demand is inherently speculative over the short-term, let alone over the course of 20 years. If such forecasting could be accomplished with the degree of

"reasonable foreseeability" that SEPA demands, then the commodity- and energy-markets would offer a relatively safe haven for investors and far less opportunity to profit from derivatives, arbitrage, and speculation on commodity futures.

The Draft EIS analysis of GHG emissions is an attempt to forecast the price and demand of coal, not just in the United States, but across all of Asia. This unprecedented geographic and temporal scope for a SEPA EIS is all the more audacious because -- the document purports to predict with "reasonable foreseeability" how coal will be priced and consumed across Asia over 20 years.

The Draft EIS attempts to make long-term predictions of commodities market behavior, and projections of what are in reality planned-economy choices made by sovereign foreign governments. As a result, the Draft EIS ignores SEPA's rule of reason and ventures into an arena where little or no certainty can be found, no matter the degree of rigor applied to the analysis.

SEPA requires an assessment of ***significant impacts caused*** by a proposed project -- i.e., impacts having a reasonable likelihood of more than a moderate adverse impact on environmental quality. Regulators cannot exercise SEPA substantive authority absent a clear demonstration that the Project is the proximate cause of an adverse impact that would not otherwise occur in its absence. These statutory constraints cannot be met in the context of a commodity and energy forecast covering an enormous geographic area over a 20 year period. And -- as discussed below -- when many of the assumptions used in the Draft EIS analysis are demonstrably false, or otherwise ignore the fundamentals of Asian and U.S. commodities and energy markets, the conclusions reached are not only unreliable, they are no more than ill-informed guesses.

Because the Draft EIS already brackets its analysis with extreme outliers -- the upper and lower bound scenarios -- the potential universe of future conditions are reflected in the document. Refining assumptions, updating information, or increasing technical rigor may add more precision to the analysis; but it will not add any more reliability or confidence to the analytical outputs. Because there is no reliable way to discern within a reasonable range of certainty whether permitting the Project would result in changes in market demand -- and therefore increases or decreases overall net GHG emissions from coal combustion over a 20 year period -- there is no reason to conduct additional coal markets and GHG emissions analyses to further refine the guesses provided in the Draft EIS.

The Final EIS should limit its GHG analysis to emissions from the Project itself and related nearby operations, as Cowlitz County and the U.S. Army Corps of Engineers both determined was appropriate for the scope of their analyses. To the extent the Ecology determines that information on GHG emissions from the use of the exported coal should be included in the Final EIS, the analysis should be provided solely for the purpose of disclosing a range of potential outcomes. This information has been amply studied and detailed in the Draft EIS; therefore, no further analysis is required for purposes of disclosure. Therefore, the Final EIS should affirmatively acknowledge that commodity and energy

forecasts are predictions, which are inherently speculative and unreliable over long timeframes and not the basis for exercising SEPA substantive authority.

1. **Long term energy and commodities market forecasting is inherently speculative**

Forecasts of long-term energy production choices and commodities demand must rely on input values for parameters that are highly variable through time No matter how well-researched and well-reasoned the inputs are, forecasts become less and less reliable as the analysis extends out over time due to the inherent complexity and variability of market dynamics (*e.g.*, fluctuations in economic policy and currencies, changes in energy policy and regulation, advancements in technology, natural disasters or black swan events, etc.). As such, deviations from expected outcomes can be introduced gradually, or can occur suddenly.

For example, consider the earthquake that led to the Fukushima Daiichi nuclear power plant disaster and fundamentally altered domestic energy use in Japan; or consider how technological innovations that spurred shale gas and oil resource development in the U.S. fundamentally altered U.S. domestic resource production. The resulting dramatic shifts in U.S. and international prices for natural gas and crude oil, and for coal in the U.S. as gas supplies soared and prices dropped, were not predicted even a handful of years before they occurred.

In addition, technological developments have advanced our renewable power supply, and smart grid, energy efficiency measures, and automation capabilities have continued to improve productivity. Tremendous research and development has occurred and continues, and the predictability of the changes and the order of magnitude on impact and timing is very difficult to anticipate. These shifting market dynamics create uncertainty and additional risks.

Macroeconomic factors and globalization further complicate the reliability of commodity and energy forecasts. Faster GDP growth can spur additional needs for electricity and increased power demand. Foreign exchange risk exists with respect to the subbituminous coal that the Project will export, which will compete with Indonesian subbituminous coal. Indonesian coal is denominated in the rupiah currency. Therefore, exchange rate risk associated with a relatively weaker or stronger U.S. dollar relative to the Indonesian rupiah will impact the relative economic attractiveness and competitiveness of U.S. Powder River Basin (PRB) coal.

Professional energy forecasters acknowledge the high degree of uncertainty they must deal with, and use a variety of approaches to bind that uncertainty. For example, the Energy Information Administration ("EIA"), which is the data arm of the Department of Energy, utilizes a reference case, along with high- and low-probability cases and some additional scenario analyses to produce an Annual Energy Outlook ("AEO"). The AEO is a comprehensive long-term energy forecast that is published annually. The EIA defines its AEO reference case forecast as follows:

> *The projections in the AEO are not statements of what will happen **but of what might happen**, given assumptions and methodologies. The AEO Reference case projection assumes trends that are consistent with historical and current market behavior, technological and demographic changes, and current laws and regulations. The potential impacts of pending or proposed legislation, regulations, and standards are not reflected in the Reference case projections.*[10]

The EIA goes on to discuss how reliable its forecasts have been over time:

> *In general, energy consumption quantities tend to be more stable and thus projected with greater accuracy than the relatively volatile concepts of net imports and energy prices. This is because energy consumption trends reflect underlying sources of inertia in the energy-consuming capital stock, substantial lead times for capital purchase decisions, locked-in contract periods, and consumer perceptions of and responses to price changes. The average absolute percent differences for energy consumption, production, and carbon dioxide emissions range roughly between 5% and 11%. **The absolute percent differences for energy prices range between 10% and 38%. Net imports tend to exhibit even larger average absolute differences, ranging between 25% and 55%, primarily influenced by pre-2008 AEOs which projected much higher net imports.***[11]

There are many reasons for the deviations between the AEO Reference case projection and actual outcomes, and many reasons why experts' annual projections concerning commodity import volumes and energy prices routinely end up being off the mark by such a wide margin.

Changes in economic, market, and technological trends in addition to policies affecting energy choices are key drivers for deviations between projections and actual outcomes. This explains why there is little certainty in even short-term projections concerning energy and commodities movements and prices. The Draft EIS does not acknowledge the magnitude of uncertainty inherent in the types of forecasts used in the GHG and coal markets analysis; it simply charges forward with a nested series of blanket assumptions, many of which ignore reality or are simply wrong.

While the Draft EIS identifies various input assumptions in the four scenarios that are analyzed, the Draft EIS fails to fully disclose the uncertainty regarding the primary input assumptions and the likelihood or probability of the occurrence of these assumptions. Moreover, the Draft EIS fails to discuss the validity of the selected scenarios, the uncertainty regarding each scenario, and the likelihood or probability of occurrence.

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[10] http://www.eia.gov/forecasts/aeo/retrospective/

[11] *Id*. (emphasis added) While the EIA establishes that ultimate outcomes deviate significantly from initial forecasts the Draft EIS errs in not reflecting these dynamics. Experts in this area of forecasting readily concede that there is tremendous uncertainty in forecasts, which routinely vary from their predictions. Those who use projections for advocacy purposes, or with a desired outcome in mind, are sometimes less willing to recognize how far from what actually occurs most projections ultimately prove to be.

In addition, the Draft EIS presents a range of possible outcomes of net GHG emissions resulting from the Project that does not reflect the likelihood that the Project will substantially reducing GHG emissions; when more closely scrutinized, there is little probability that the GHG emissions resulting from the Project would be as large as the Draft EIS ultimately predicts, and there is a high likelihood that the GHG impact attributable to the Project is very low, if not negative.[12]

Outside of the Draft EIS, Ecology and ICF (the contractor used to develop the Draft EIS) have addressed forecasting uncertainty issues head-on. For instance, both Ecology and ICF have acknowledged the speculative nature of evaluating commodity markets. In a separate SEPA Draft EIS evaluating, among other things, future GHG emissions related to a proposed crude oil transloading facility, Ecology and ICF concluded:

Whether the cumulative projects result in an increase in GHG emissions relative to the no-action alternative depends on speculative factors. For example, the relative contribution of the cumulative projects to the net change in CO2 emissions would depend on whether the cumulative projects result in increased demand for crude oil or displace other crude oil consumed by end users (which depends, in part, on the source and final destination of the oil), what type of crude oil is being transported (i.e. which emissions factors are used) and what the end use is (*e.g*. combustion, development of other products.)"[13]

The Draft EIS does not explain how Ecology and ICF can conclude that the level of uncertainty is too high to accurately evaluate increases in GHG emissions from crude oil shipments, but is not too uncertain to evaluate incremental new GHG emissions that might be caused by the Project.

In sum, the Draft EIS analysis of international market factors relating to coal consumption and resulting GHG emissions is not, and cannot be made to be any more reliable than other attempts at this speculative endeavor such as the EIA. The Final EIS should acknowledge the high degree of variability that is inherent in all long-range forecasts of commodity and energy markets. Short of demonstrating that there is a reliable basis to conclude that the incremental new emissions forecast by the Draft EIS are likely or reasonably likely to occur, Ecology must apply SEPA's rule of reason and conclude that the analysis is too speculative to be used a predicate for the exercise of SEPA substantive authority.

2. <u>SEPA does not permit selection of a "most likely" scenario when all scenarios are speculative</u>

The GHG analysis in the Draft EIS does not provide an analysis that identifies what is "likely or reasonably likely" to occur,[14] and in fact, no analysis could accurately predict what will occur in energy

[12] For a detailed discussion of confidence in the Draft EIS outputs see, Attachment 4 (document 1)- *Evaluation of the Statistical Confidence Level of the Draft EIS GHG Forecast Analysis*
[13] Westway Expansion DEIS August 2015, Chapter 6 Cumulative Impacts, page 6-13.
[14] SEPA does not require analysis of impacts that are "merely speculative." An impact is not speculative if it is "likely or reasonably likely to occur, as in there is a reasonable probability of more than a moderate effect on the

and commodities market between 2018 and 2038. Instead, Ecology simply defines four scenarios that are all considered "plausible," and then chooses one of the four that it deems the "most probable outcome."

The Draft EIS is silent on the probability that events in the world will play out through 2038 as depicted in the "most probable outcome" scenario. Rather, the selection process was based on Ecology's view that this scenario -- the 2015 Energy Policy Scenario -- is somewhat more likely than the other scenarios.

SEPA, however, requires an analysis of significant impacts. "Significant" means "a reasonable likelihood of more than a moderate adverse impact on environmental quality"; and "impacts" are defined as "the effects or consequences of actions."

The Draft EIS provides no rational basis to conclude that the 2015 Energy Policy Scenario (the "2015 Scenario") is a more likely outcome than any of the other scenarios discussed. The Final EIS must conclude that any effort to forecast commodity and energy markets, and select one scenario to reflect the reasonably foreseeable impacts of the Project on the Asian market place over a 20 year period, does not meet SEPA's "rule of reason" standard.

While the analytic approach in the Draft EIS is sufficient for disclosure purposes, it is not reliable enough to exercise SEPA substantive authority. SEPA requires that an agency demonstrate identifiable impacts are "likely or reasonably likely" to occur before imposing any mitigation. As described more fully below, because the range of scenario alternatives analyzed in the Draft EIS reflects the fundamentally and inherently speculative nature of this exercise, it does not provide a valid basis for imposing GHG mitigation offsets.

3. <u>The 2015 Energy Policy Scenario is especially biased and unrealistic because it relies on many flawed assumptions</u>

As noted above, any attempt to forecast international commodities market dynamics must rely on assumptions and other inputs. To the extent those assumptions and inputs do not reflect reality, the outputs of the analysis will be unreliable. All four of the GHG analysis scenarios are underpinned by assumptions that are either highly questionable or involve variables that cannot reliably be predicted over a longer time period.

In particular, the 2015 Scenario is based on highly speculative and unrealistic assumptions and other inputs that are quite simply wrong. In each case, the assumptions and faulty inputs used in the 2015 Scenario all have the effect of increasing the net GHG emissions that particular scenario predicts will be caused by the Project. All of the concerns enumerated below all relate to the 2015 Scenario, and some apply to other scenarios as well.

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quality of the environment." However, if an impact "merely ha[s] a possibility of occurring," SEPA treats it as "remote or speculative."

a. Elasticity of Demand

The Draft EIS GHG analysis does not discuss unique structural constraints and market limitations in Asian economies. Instead, it incorrectly assumes an induced level of additional coal consumption in Asia based on a change in delivered coal prices that it assumes will result from the Project.

While the Draft EIS states that its assumptions concerning induced demand are based on eight academic studies of the elasticity of demand somewhere in Asia, the studies are not identified and there is no supporting documentation concerning the assumptions and analytical methods used in those studies.[15]

By simply assuming the new coal consumption will be induced in Asia, the Draft EIS fails to take into account how energy production decisions are actually made in many Asian countries that run on planned economies. Rather than choices being made in a functioning market where dispatch decisions routinely occur based on differences in price between competing commodities (e.g., natural gas vs. coal), power producers in countries like Japan, South Korea and Taiwan have much more limited options. They rely on coal for baseload power production without being able to switch from one form of baseload power production to another in response to market price fluctuations. Even if the Project results in a small price decrease in coal in Asia, that price difference should not cause additional coal to be consumed because the subbituminous PRB coal that will be exported through the Project would simply substitute for subbituminous coal from Indonesia or other suppliers in the Asian market.

The Draft EIS's induced demand assumptions also ignores the reality of how energy production decisions are made in Asian countries, where new power plants are constructed based on the implementation of long-term national energy plans rather than being the product of electric utility decision-making in a functioning power production market, as in the U.S. For example, Japan, South Korea and Taiwan employ government-directed energy plans that seek to ensure that relatively inexpensive electric power is reliably available for industrial and household use.[16] Decisions concerning how baseload power will be produced are made in those plans, and then implemented. The result is a system where potential small changes in the price of coal are irrelevant.

Moreover, even though the Draft EIS impact analysis extends well beyond the borders of Washington State and the United States, it does not account for international or foreign country requirements and enforcement that would mitigate GHG emissions. By way of analogy, RCW 80.70 mitigates for carbon dioxide emissions for power plants to be located in Washington State. Likewise in Asia, power plant emissions are also regulated. If CO2 mitigation provisions in RCW 80.70 are presumably reasonable for GHG mitigation, then the Final EIS should account for GHG mitigation measures in Asia.

[15] For a detailed discussion of elasticity of demand, see Attachment 4 (document 2)-*Evaluation of Draft EIS Assumed Induced Demand for Coal in the Pacific Basin Based on an Elasticity of Demand Assumption.*
[16] *Id*. (for a discussion of planned economies).

For example, mitigation measures have already been implemented in other countries as expressed in their policies and laws, including the countries that will receive our exports:[17] Japan has a carbon tax;[18] Korea has a carbon cap and trade program;[19] and Taiwan has mandated cuts in GHG emissions.[20] In other words, the Draft EIS implementation of GHG commitments is inconsistent across countries.

While the DEIS includes policies for the U.S. and China, the GHG reduction policies of other Pacific Basin countries ae not included. If all of the countries analyzed in the Draft EIS commit to GHG reductions and an effective cap on GHG emissions, then no increase in GHG emissions in the Pacific Basin would result from the Project. The Draft EIS improperly assumes that more coal will be consumed in Asian countries in response to any decrease in price, no matter how small. This means that Asian countries will either use more coal at existing plants by increasing operational levels in response to a small price drop, or will choose to build new coal-fired power plants that they would not have otherwise constructed.[21] Given the planned nature of Asian economies, neither of these outcomes is likely.

In Asia, where coal is used as baseload power and power plants are constructed based on long-term energy plans that take a myriad of factors into account, assuming that additional power plants will be built because a new coal export dock is opened on the Columbia River is patently unrealistic and unreasonable. And unlike in the U.S., where coal competes directly with natural gas in a functioning power production market, there is little or no opportunity for Asian power producers to choose different base load power production methods in the short term in response to a small price decrease -- they are already locked into whatever their national energy plan has provided for them for baseload power generation. The failure to take the reality of how Asian power production choices are made results in an analysis that simply assumes its way to an answer rather than objectively evaluating what can reasonably be foreseen.

b. Relative Heat Content of PRB Coal versus Indonesian Coal

The Draft EIS erroneously assumes (without any supporting documentation) that the heat content of subbituminous coal exported from Indonesia (which is the only source of subbituminous coal in ICF's model other than the PRB coal exported through the Project) has much higher heat content than PRB

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[17] *See* www.iea.org/policiesandmeasures/climatechange

[18] http://www.iea.org/policiesandmeasures/pams/japan/name-139284-en.php?s=dHlwZT1jYyZzdGF0dXM9T2s,&return=PG5hdiBpZD0iYnJlYWRjcnVtYiI-PGEgaHJlZj0iLyI-SW50ZXJuYXRpb25hbCBFbmVyZ3kgQWdlbmN5Jnp3bmo7PC9hPjxzcGFuPiAmZ3Q7IDwvc3Bhbj48YSBocmVmPSIvcG9saWNpZXNhbmRtZWFzdXJlcy8iPlBvbGljaWVzIGFuZCBNZWFzdXJlczwvYT48c3Bhbj4gJmd0OyA8L3NwYW4+PGEgaHJlZj0iL3BvbGljaWVzYW5kbWVhc3VyZXMvY2xpbWF0ZWNoYW5nZS8iPkNsaW1hdGUgQ2hhbmdlPC9hPjxzcGFuIGNsYXNzPSJsYXN0Ij48L3NwYW4+-PC9uYXY-

[19] http://thinkprogress.org/climate/2015/01/12/3610553/south-korea-cap-and-trade/

[20] https://www.linkedin.com/pulse/passage-greenhouse-gas-reduction-act-taiwan-brings-business-yang?articleId=7781337123632157209

[21] For a detailed discussion of the economic basis for construction of new thermal plants, see Attachment 4 (document 2) -*Evaluation of Draft EIS Assumed Induced Demand for Coal in the Pacific Basin Based on an Elasticity of Demand Assumption.*

coal. As a result of this erroneous assumption, the Draft EIS projects that it will require greater quantities of coal shipped through the Project to replace the same heat content of Indonesian coal. This assumption results in higher GHG emissions for the same amount of electricity generated from exported coal, both from coal combustion and transportation and thereby r biases the EIS's prediction of greater GHG emissions when PRB subbituminous coal substitutes for Indonesian subbituminous coal.[22]

On the contrary, the average heat content for Indonesian subbituminous coal is approximately 4,820 kcal/kg, equal to 8,676 Btu/pound. This heat content is lower (rather than higher as asserted in the Draft EIS) than the heat contents for U.S. PRB coals which are likely to be exported through the Project (Montana – 9,300 Btu; Wyoming – 8,800 Btu). And the actual average heat content for Indonesian subbituminous coal is much lower than the heat content for Indonesian subbituminous coal assumed in the Draft EIS (5,400 kcal/kg, equal to 9,720 Btu/pound). The average heat content for Indonesian bituminous coal is approximately 6,365 kcal/kg (11,457 Btu/pound), which is similarly much lower than ICF's assumption of 6,583 kcal/kg (11,850 Btu/pound).

c. Relative CO2 Content of PRB Coal versus Indonesian Coal

The Draft EIS also erroneously assumes that the carbon coefficients of the U.S. subbituminous and bituminous coals that would be exported through the Project are significantly greater than the carbon coefficients of the coal from Asian sources that would be displaced. In other words, the analysis assumes that a ton of exported U.S. coal will produce more GHG emissions when it is burned than a ton of Asian coal. This incorrect assumption results in an increase in GHG emissions attributed to the Project even without assuming an induced greater demand for coal.[23] As with the inaccurate heat content assumption, this error introduces an unwarranted bias to the analysis. This error alone accounts for 42% of the total increase in GHG emissions that the 2015 Scenario attributes to the Project.

For example, the average CO2 emission factor for Indonesian subbituminous coals is higher than the average emission factor assumed in the Draft EIS (214.6 pounds per mmBtu vs. 212.7 pounds per mmBtu) and is higher than the emission factors for US subbituminous coals (211.3 – 213.1 pounds per mmBtu). As a result of these erroneous assumptions, the Draft EIS shows that U.S. coal has higher carbon coefficients than other Asian coal, accounting for 42% of the total increase in GHG emissions from coal combustion under the 2015 Scenario.

[22] For a more detailed discussion on relative heat content, see Attachment 4 (document 3) - *Heat Content of Indonesia Coals.*
[23] For a detailed discussion on relative CO2 content, see Attachment 4 (document 4)- *Carbon Coefficients of US and Indonesian Coals*.

d. Relative efficiency of U.S. versus Asian coal-fired power plants

The operational efficiency of the Asian fleet of coal plants is superior to the U.S. coal plant fleet.[24] The Asian coal fleet has newer supercritical or ultra-supercritical coal plants that require a lower quantity of coal to produce a single unit of power. On average an Asian coal plant that consumes PRB coal produces fewer GHG emissions because it produces more power per unit of coal input. Failing to take this difference into account results in a biased prediction of greater GHG emissions than would actually occur even if one were to assume improperly that the Project would induce greater demand for electric power in Asian economies.

For example, in South Korea and Japan, approximately 73% and 74% of the respective coal fleets are supercritical or ultra-supercritical coal plants. In comparison, approximately 27% of the coal fleet in the U.S. includes supercritical or ultra-supercritical coal plants. On average, the U.S. fleet of coal plants is approximately 15% less efficient than the South Korean and Japanese coal fleets. This means that the South Korea and Japan coal fleet consumes 15% less coal to generate the same level of power, respectively, than U.S. coal plants. Therefore, Japanese and South Korean coal plants will emit approximately 15% less CO2 to generate the same level of power than U.S. coal plants consuming PRB coal.[25]

e. Substitution of Subbituminous Coal for Bituminous Coal

The Draft EIS erroneously assumes that the Project will result in the substitution of subbituminous coal for bituminous coal, rather than substituting for subbituminous coal from other sources. In particular, the Draft EIS 2015 Scenario assumes that Japanese power plants, which are designed for bituminous coal use but can use a mix that includes a small percentage of the less expensive subbituminous coal, will increase the percentage of subbituminous coal used in their power plants from the current 7% to 30% in response to the Project being permitted and operating.

This error is significant because it may not be possible and it is thus unreasonable to assume that Asian power plants may readily substitute subbituminous coal in place of bituminous coal .This error also biases the analysis because it results in increased GHG emissions from: (i) coal substitution (subbituminous coal has greater carbon coefficients than bituminous coal.); (ii), coal transportation (more tons need to be mined and transported), and (iii) even induced coal demand (subbituminous coal is cheaper than bituminous coal).

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[24] For a more detailed discussion of relative efficiencies, see Attachment 4 (document 2)- *Evaluation of Draft EIS Assumed Induced Demand for Coal in the Pacific Basin Based on an Elasticity of Demand Assumption.*

[25] This relative efficiency is further augmented by efforts to manage and capture CO2. For example, South Korea's power plants capture and recycle CO2 gas (http://www.koreatimes.co.kr/www/news/biz/2016/05/123_205426.html) http://www.iea-coal.org.uk/site/2010/news-section/news-items/iea-clean-coal-centre-points-to-japans-clean-coal-leadership); and Japan's power plant designs will reduce CO2 and GHG emissions over the study period

These erroneous assumptions also ignore the fact that Japanese power producers already have a powerful economic incentive to maximize the use of subbituminous coal because the price of the Indonesian subbituminous coal they already use is substantially less than bituminous coal. Current market prices would imply that end-users cannot substitute more subbituminous coal for bituminous coal than they are already doing in the market. There is a large differential in market prices for Indonesian bituminous and subbituminous coals, especially for the lower heat content coals (4,200 kcal/kg). Economics would dictate that, if Japanese customers could use more subbituminous coal to displace bituminous coal in existing boilers, they would already be doing so today. Yet, the Draft EIS provides no explanation for why Japanese power producers will make this switch in response to the Project becoming operational when they have not done so to date in response to the ready availability of comparable subbituminous coal from Indonesia.[26] A substantial portion of the increased GHG emissions that the 2015 scenario attributes to Project results from this erroneous assumption, independent of whether or not additional coal use is induced by the Project.

f. The CPP Will Not Eliminate Price Competition Among Fuels in the US

The Draft EIS states that the 2015 Scenario is intended to reflect "how recent international climate negotiations and perspectives on future climate policies might affect GHG emissions under the Proposed Action"; and to evaluate how "the November 2014 U.S.-China announcement on climate change action goals and implementation of the proposed U.S. EPA Clean Power Plan" could impact coal consumption and energy production on both sides of the Pacific.[27]

The Draft EIS analysis of the 2015 Scenario eliminates any offset from reduced U.S. GHG emissions by assuming that implementation of the Clean Power Plan (CPP) will essentially eliminate the current competition between coal and natural gas in the U.S. (and will do so *before* any induced increase in price of US coal reduces coal usage and accordingly, GHG generation, in the U.S.). Coal use in the U.S. has dropped substantially in recent years, largely due to the availability of inexpensive natural gas. The 2015 Scenario relies on a projected increase in gas prices and a projected price gap that would allow coal-fired power generation to outcompete natural gas power generation when an anticipated massive influx of new power from renewables frees up space below emissions caps.

In the 2015 Scenario, a small increase in U.S. coal prices caused by the Project would not make any difference in the U.S. because slightly more expensive coal will still be significantly cheaper than gas. For this to work, however, gas prices will have to rise significantly in relation to coal. Currently, the

[26] For a detailed discussion on coal substitution, see Attachment 4 (document 5) - *Substitution of Subbituminous Coal for Bituminous Coal in Asia*.

[27] Millennium Bulk Terminals—Longview SEPA Environmental Impact Statement: SEPA Coal Market Assessment Technical Report, p. 5-5. Note the use of the words "might" and "could" with respect to Ecology's choices concerning key variables in the analysis. When an analysis is based on predicted events that only "might" or "could" take place in a particular fashion, the results of that analysis cannot validly be called "reasonably certain" to occur.

short run marginal cost of producing power with natural gas is comparable to or less than producing power with coal in many U.S. markets, so the 2015 Scenario depends on it becoming cheaper to generate power using coal rather than natural gas.

The 2015 Scenario assumes this will happen by inflating the price of natural gas from its average 2014 Henry Hub price of $4.4/MMBTU (presumably the most recent price available when the analysis was done). For the 2015 Scenario to be anything more than an interesting theoretical exercise, the price of gas has to rise significantly above that level, with coal prices remaining at their current historic low levels. For 2016, the 2015 Scenario projects that the price of gas will remain at the 2014 price of $4.4/MMBTU, and then rise to $5.0 in 2018. Instead of remaining stable through 2016, however, natural gas prices dropped to $2.6/MMBTU in 2015 and have declined further to $2.0/MMBTU so far in 2016. Rather than stabilizing prior to beginning the steady upward climb predicted by the 2015 Scenario, natural gas prices unexpectedly dropped by over 50% from the 2014 price.

The fact that the 2015 Scenario analysis was likely inaccurate before the Draft EIS could even be printed highlights the speculative nature of commodity forecasts (see Section I.A above). As of this writing, the Draft EIS's projected gas prices are more than 100% higher than actual gas prices and are clearly off by a very wide margin, and we have not yet even arrived at the 2018 start year for the 20-year Draft EIS analysis.

This error alone should be sufficient to demonstrate that the 2015 Scenario cannot accurately predict gas price movements. At a minimum, it now appears highly unlikely that the well-documented price elasticity of the demand for coal that has been present in the U.S. power sector for a very long time (and is accounted for in the 2014 and Low Bound Scenarios) will be eliminated by the CPP, even if it survives judicial review and is implemented in its current form.[28]

The Draft EIS also errs in improperly assuming that the CPP will be implemented in a blanket fashion across all states, no matter the differing energy production options and market dynamics that exist across the country. As with the commodity price assumptions embedded in the 2015 Scenario, the effect of this assumption is that states implementing the CPP will have little or no choice concerning the power generation mix used to fit within emissions caps. Options will be limited, choices will be obvious, and a small change in coal prices will therefore make no difference. As with the commodity price assumptions, this assumption requires that longstanding U.S. energy market realities be turned upside down. Cost-based choices that are freely available to electric utilities would have to be extinguished across the entire country. Even if the CPP survives judicial review without any significant changes, is not altered by a future EPA or Congress, and is implemented in its current form through 2038, each state would have the opportunity to customize how it intends to generate electricity and offset GHG

[28] In addition to applying an outdated and draft version of the CPP, the Draft EIS only considers a rate cap mechanism to comply with the CPP even though there are additional approaches available. For example, a mass base approach would likely lead to lower GHG emissions from the Project, as would emissions trading.

emissions. The price of coal will not suddenly become irrelevant in the U.S., as it will be factored into decisions made at the state and regional levels even if the CPP is implemented in its current form.

The Draft EIS choice of this scenario as "most probable" is unsupportable when that scenario depends on sudden and dramatic changes in longstanding U.S. market dynamics and price change projections that have already proven to be far off the mark.

g. The 2015 Scenario Depends on Non-Compliance with International Agreements

The 2015 Scenario only takes into account international GHG reduction commitments of the U.S. and China. However, the Paris Accord was signed by 175 countries on April 22, 2016. Signatories include South Korea, Taiwan and Japan -- the key target markets for PRB coal. Emissions reductions commitments by those countries will limit the potential for expanded coal use (see discussion in Section I.3.a). These limitations, when implemented, will function as a cap on the use of coal, meaning that customers for PRB coal exported through the Project will be substituting PRB coal for coal from other sources, rather than expanding their use of coal. For the 2015 Scenario to work, the Project must induce greater coal demand in Asia, with that greater demand most likely coming from Japan, Korea and Taiwan. For that to happen, the national commitments made by those countries in signing the Paris Accord must be violated. There is no basis provided in the Draft EIS for concluding that Japan, Korea and Taiwan will not live up to their commitments.

h. 2014 Scenario provides a more accurate reflection of U.S. market dynamics

Given the significant infirmities associated problems detailed above with the 2015 Scenario, the Past Conditions (2014) Scenario (the "2014 Scenario") provides a more realistic view of potential future outcomes in the U.S. while the Low Bound Scenario is a more realistic scenario concerning effects in overseas markets. The 2014 Scenario assumes current market dynamics in the U.S., where coal and natural gas actively compete and any increases in price for either commodity will decrease its use. The 2014 Scenario does not project dramatic changes in market dynamics due to future regulatory constraints such as the CPP or major price shifts. It projects that some displacement of coal use by natural gas will occur in the U.S. due to higher coal prices generated by the opening of other markets for PRB coal. The assumed decrease in coal consumption employed in this Scenario results in a net decrease in GHG emissions throughout the time period examined in the Draft EIS.

The results of the 2014 Scenario are also consistent with the results of an analysis recently employed in a federal agency's environmental review addressing similar coal export terminals (Tongue River). That analysis quantified a reduction in U.S. GHG emissions due to new export terminal capacities driving up U.S. coal prices, resulting in decreased U.S. coal consumption. Although none of the four scenarios can reasonably be said to accurately predict the manner that U.S. markets and energy production will evolve over the next 20 years, the 2014 Scenario offers the least uncertainty because it simply carries forward the domestic market dynamics that are currently in place.

With respect to Asian GHG emissions, the Low Bound Scenario most accurately reflects market dynamics, as it assumes the lowest level of induced demand. As detailed above, the planned nature of power generation decisions in Asian economies, the limited ability to switch fuels, and baseload dynamics of Asian power production show that very little or no increased consumption will be induced by the Project's introduction of a new source of coal into a market that is already amply supplied with low cost subbituminous coal.

i. Conclusion

All forecasts rely on assumptions and other inputs. Projections can be made and opinions about what may happen can be offered, but decades-long changes in commodities and energy markets cannot be forecast with reasonable certainty. As shown above, many of the assumptions used in the Draft EIS do not reflect reality or are simply wrong, rendering the analysis unreliable.

While correcting these errors may provide greater precisions, additional analysis will not increase reliability. No matter how well researched data inputs and assumptions are many questions simply cannot be reliably answered with modeling or other analysis. Due to the complexity and inherent variability of market behavior over time, any snapshot of reality today can quickly distort over time due to the unforeseen or the unpredictable.

This explains why the EIA and other forecasters continually update and refine their analysis -- on a daily, monthly and yearly basis -- to account for intractable and constantly changing market dynamics. The inherent unreliability of commodity and energy forecasts requires constant course correction to allow models to more closely approximate actual market conditions. This is why no amount of additional information, refined assumptions, or increased technical rigor will -- in a snapshot EIS -- result in an accurate energy commodity market forecast reflecting domestic and international dynamics over a twenty year period, let alone accurately account for the impact of a single domestic export project on those markets.

4. <u>No Additional Analysis is Needed for the Final EIS</u>

For these reasons, the Final EIS need not incorporate any additional analyses. The Draft EIS analysis has bracketed a wide range of potential outcomes, each of which is identified as "plausible," without demonstrating with any degree of certainty whatsoever that any of the alternatives provided represents what will most likely occur through 2038.

Due to the inherent uncertainty and variability involved with all such forecasts, no amount of analysis can ascertain what will occur in energy and commodities markets over the relatively near term, much less over the course of a multi-decade time period. Given this fact, there is no need for Ecology to revisit the coal markets analysis other than to simply identify the scenarios as what they are – "guess estimates" at what may occur in the future that are provided for disclosure purposes.

III. SEPA substantive authority cannot be exercised because the EIS does not demonstrate an environmental impact in Washington State that would be caused by the Project

Even though the Draft EIS suggests that the Project would result in incremental new GHG emissions, the Draft EIS does not establish a rational basis to conclude that the Project would be the proximate cause of (a) environmental impacts in Washington State, or (b) a significant level of emissions.

To the contrary, the Draft EIS states that climate change impacts in Washington State will be the same with or without the Project. Despite this statement, the Draft EIS concludes -- without any legal basis -- that laws and guidance having no regulatory bearing on the Project to establish a *de facto* level of significance of GHG emissions.

However, without establishing the causal link between the purported GHG emissions and an environmental impact that would be avoided were the No Action Alternative selected there is no basis to exercise SEPA substantive authority to mitigate for any assumed increase in GHG emissions as a result of the Project. Further, the proposed mitigation in the Draft EIS fails to demonstrate how it has an essential nexus or is roughly proportionate to the impacts.

Nexus and proportionality are essential to the exercise of substantive authority to impose mitigation; and a failure to demonstrate either violates SEPA and the U.S. Constitution. The Final EIS should, therefore:

- disclose that GHG emissions related to the Project are not likely to be the probable cause of a discernable and new environmental impact in Washington State that would not otherwise occur;
- acknowledge candidly that there are not yet applicable laws or regulations that govern the level of GHG emissions attributed to a transloading facility like the Project that could serve as a basis for a finding of significance; and
- eliminate any proposed GHG mitigation requirements for off-site emission.

1. <u>The Draft EIS fails to establish a causal link between the Project and an identified environmental impact</u>

Causation is a central issue for a SEPA EIS.[29] To establish causation in the context of a GHG analysis under SEPA, Ecology has adopted the use of the "proximate cause" test. Proximate cause requires a showing that the proposal is the cause of the emissions in a direct sequence, unbroken by any superseding cause. The courts have further defined proximate cause as whether the action and the

[29] WAC 197-11-752 (defining "impacts" as "the effects or consequences of actions"); WAC 197-11-060(4)(e) (noting that the "range of impacts to be analyzed in an EIS….will depend [in part on] the extent to which the adverse impacts are attributable to the applicant's proposal").

impacts (emissions) are "two links of [the same] chain." If the environmental impact is linked to the action, then it should be considered under SEPA.[30]

Even assuming the Draft EIS' commodity and energy market forecast correctly predicts (which it does not) the incremental new emissions caused by the Project, the analysis does not show how these new emissions are the "proximate cause" of new adverse impacts to the Washington State environment.[31] The 9th Circuit Court of Appeals' discussion in *Washington Environmental Council v. Bellon* is instructive on the application of the causation requirement to GHG emissions.[32] There, the Court concluded that

> [I]t is not possible to quantify a causal link, in any generally accepted scientific way, between GHG emissions from any single oil refinery in Washington or the collective emissions of all five oil refineries located in Washington, and direct, indirect or cumulative effects on global climate change in Washington or anywhere else."[33]

The Draft EIS ignores the science that shows the causal chain between project-level GHG emissions and impacts to the environment as being too attenuated, i.e. the disjunction -- or breaking of the causal chain between localized injuries and the environmental effects due to the accumulation of GHG concentrations over the course of many decades. The Draft EIS attempts to bootstrap the analysis by stating that "[t]he climate change impacts resulting from [the Project's] increase to greenhouse gases would persist for a long period of time, beyond the analysis period and are considered permanent and, while global in nature, would affect Washington State."[34] This conclusory statement, however, is entirely unsupported because the Draft EIS does not comment upon or attempt to link specific climate-change impacts in Washington State that would not otherwise occur due to emissions associated with the Project, nor does it show how these incremental new GHG emissions rise to the level of "significance."

It may be tempting to assume a relationship between the workings of general circulation models ("GCMs")[35] and the workings of air quality models commonly used to assess the health and other impacts of criteria pollutant emissions. But unlike criteria pollutants, GHGs mix across a "global airshed," which makes it impossible to establish through modeling the kinds of "cause and effect" relationships

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[30] Ecology, *Guidance for Ecology Including Greenhouse Gas Emissions in SEPA Reviews* at 3 (June 3, 2011) (citing *U.S. Dep't of Transp. v. Pub. Citizen*, 541 U.S. 752, 754 (2004)) ("Although Washington courts have not ruled on this issue as it relates to SEPA, we have used the same standard in the state because it presents a reasonable approach to defining the scope of impacts that need to be considered.").

[31] An overview of the basis to establish an impact was provided to the Co-Leads (*Greenhouse Gas Emissions and Environmental Impact Analysis: evaluating climate change impacts under NEPA and SEPA for Millennium Bulk Terminals - Longview*, Tohan, A., August 1, 2014).

[32] *Washington Envtl. Council v. Bellon*, 732 F.3d 1131, 1142-43 (9th Cir. 2013).

[33] *Id*.

[34] Draft EIS, p. 5.8-16.

[35] General Circulation Models ("GCMs" also called Global Climate Models) are the primary tool available for forecasting climate change on the basis of alternative GHG emissions scenarios. Many GCMs are in use today. Climate change forecast are built on multiple GCMs run as an ensemble to avoid potential biases or limitations of any individual GCM.

between GHG emissions and climate change impacts that may be possible when modeling criteria pollutant impacts on human health or the environment. GCMs -- and other methods to downscale emission impacts -- cannot be run to assess environmental impacts attributable to a single project because model assumptions and scale, and the complexity of the climate system itself, do not allow for it.[36]

The Draft EIS appears to conclude as much with respect to climate change impacts **to** the Project: "[o]ngoing and expanded operations in the project area [under the No Action Alternative] would be affected by climate change as described for the Proposed Action."[37] As a result, the Draft EIS determines that "potential climate change impacts on the Proposed Action in the project area are not considered significant and would not necessitate mitigation."[38] In effect, the Draft EIS concludes that climate change impacts are the same with or without the Project.

The Final EIS should extend this same conclusion to the Project because GHG emissions, which the Draft EIS claims are attributable to the Project, cannot be the proximate cause of detectable environmental impacts in Washington State.

2. Even if GHG emissions are a proxy for an environmental impact, the Draft EIS fails to establish that the emissions constitute a significant impact

Just as it ignored the science about whether a causal link between the Project and an identified environmental impact can be established, the Draft EIS similarly ignores the science related to what level of emissions may be significant under SEPA. A federal district court recently concluded that:

> "[G]iven the current state of science it is impossible to determine what effect any given amount of GHG emissions resulting from an activity might have on the phenomena of global warming, climate change, or the environmental effects stemming from it. It is therefore not currently possible to associate any particular action and its specific project-related emissions with the creation or mitigation of any specific climate-related effects at any given time or place. However, it is known that certain actions may contribute in some way to the phenomenon (and therefore the effects of) climate change, even though specific climate-related environmental effects cannot be directly attributed to them."[39]

While NEPA and SEPA guidance describe the use of GHG emissions as a "reasonable proxy" for impacts, there is no legal basis to exempt from the analysis the principles of reasonable foreseeability and proximate causation to identify discernible, non-speculative impacts. In addition, even if emission levels could arguably provide a meaningful proxy for comparing alternatives (which they do not), emission levels are useless for imposing mitigation unless the 'nexus' and proportionality requirements are satisfied. .

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[36] For a detailed discussion on GCMs, climate change and environmental impacts, *see* Attachment 4 (document 7) - *Review of Approaches for Significance and Mitigation*.
[37] Draft EIS, p. 5.8-33.
[38] *Id*.
[39] *WildEarth Guardians v. United States Forest Service*, 120 F. Supp. 3d 1237, 1271 (2015).

To properly use GHG emissions as a proxy for a traditional SEPA environmental impact analysis, the analysis must show why those specific emissions are significant -- *i.e*., there is "a reasonable likelihood of more than a moderate adverse impact on environmental quality."[40] Short of demonstrating how a specific quantity of GHG will actually result in more than a moderate adverse impact on environmental quality, there is no basis to conclude any emissions would be significant impact attributable to the Project.

Given the infirmities identified above, the Draft EIS bootstraps its significance analysis with a comparison to various intensity thresholds proposed in federal and state regulations and guidance, including the draft Washington State Clean Air Rule, the EPA's Tailoring Rule and also the Draft Council on Environmental Quality (CEQ) guidance.

a. ***The Draft EIS improperly concludes that "[t]hese standards provide guidance on assessing the significance of various levels of greenhouse gas emissions"[41]This statement and approach adopted leads to the Draft EIS conclusion that "…emissions attributable to the operations of the Proposed Action under the 2015 Energy Policy Scenario are considered adverse and significant". This conclusion is misleading and an incorrect basis for determining significance for the following reasons: These federal and state thresholds are not risk-based and were not established with a view to determining significance. For example, the Draft CEQ guidance provides the 25,000 metric tons of CO2e per year as a reference point and states "When using this reference point, agencies should keep in mind that the reference point is for purposes of disclosure and not a substitute for an agency's determination of significance under NEPA."***

b. ***The Washington State Clean Air Rule and the EPA's Tailoring Rule apply to direct facility-level emissions, and not to indirect life-cycle emissions that might occur outside the fence line of a regulated facility; and as such, are intended for comparison to emissions for a different set of boundary conditions than those used in the Draft EIS.***

Determining significance by comparing emissions to other laws and guidance is inappropriate because they do not apply to Project permitting decisions. In addition, unlike other proxies developed through legislation and rulemaking -- such as National Ambient Air Quality Standards or state water quality standards -- the Draft EIS provides no basis to conclude that these proxies demonstrate a reasonable likelihood that the Project emissions will cause more than a moderate adverse impact on environmental quality.

Nor do comparisons to other proxies -- such as "an equivalent number of cars" -- offer a more defensible or legally appropriate way to comply with SEPA. These types of proxies simply attempt to make the analysis more intuitive, but they do not provide any greater rational for why project-level emissions will cause impacts to the Washington State environment that would not otherwise happen; nor do they

[40] WAC 197-11-794(1).
[41] Draft EIS at 5.8-16.

provide a standard against which to measure an impact -- as a matter of changes in global GHG concentration or as a policy matter where a legislative body has created a significance threshold.

For example, the Draft EIS states that under the 2015 Scenario, the level of new net emissions from the Project would be "equivalent to adding about 672,100 passenger cars on the road each year."[42] Yet in 2015, Northwest ports from Portland to Vancouver imported more than 900,000 cars.[43] Each of those ports is "actually importing cars," but none has been asked to study the lifecycle effect in SEPA documents.

As discussed above, current science -- be it GCMs or downscaling methods -- cannot be applied to show environmental impacts attributable to project-level emissions. Because the state of the science precludes meaningful analysis -- or renders the analysis of those impacts speculative -- the Final EIS should expressly conclude that gaps in relevant information or scientific uncertainty concerning significant impacts limit use of the analysis to disclosure purposes only.[44]

Furthermore, there is no foundation under law or policy that SEPA can be applied to use a lifecycle analysis to impose mitigation requirements. If every state through which a commodity or industrial product passed could decide to perform a lifecycle analysis and require mitigation for alleged impacts, the cost in permitting delay and mitigation expense would virtually stop commerce. This, of course, would lead to Constitutional violations under the Commerce Clause as well as to violations of international trade laws.

The U.S. Constitution vests Congress with the exclusive power to regulate interstate commerce.[45] As a corollary, the Commerce Clause "denies the States the power unjustifiably to discriminate against or

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[42] Draft EIS, p. S-38.

[43] Using information obtained from the respective ports, auto handling volumes in the Pacific Northwest for 2015 was as follows:

Portland	262,874
Seattle /Tacoma	175,802
Grays Harbor	76,628
Vancouver WA	90,183
Vancouver BC	384,500
TOTAL	**989,987**

[44] SEPA's rule of reason standard states that an EIS need not discuss "every remote, speculative, or possible effect or alternative[.]" *Toward Responsible Dev. v. City of Black Diamond*, No. 69418-9-I, 179 Wn. App. 1012, at *2 (Wn. Ct. App. Div. 1 Jan. 27, 2014).

[45] *Oregon Waste Systems, Inc. v. Dep't of Environmental Quality of the State of Oregon*, 511 U.S. 93, 98, 114 S.Ct. 1345, 128 L.Ed.2d 13 (1994) (citing U.S. Const. Art I, § 8, cl. 3); *Gibbons v. Ogden*, 22 U.S. 1, 74-75, 6 L.Ed. 23, 9 Wheat. 1 (1824) (Congress's power to regulate interstate commerce necessarily includes the "power to regulate navigation . . . within the limits of every State in the Union; so far as that navigation may be, in any matter, connected with commerce with foreign nations, or among the several States, or with the Indian tribes.").

burden the interstate flow of articles of commerce."[46] The clearest example of discrimination or burden on the flow of commerce is a law that overtly blocks the flow of interstate commerce at a State's borders.[47] Even laws with legitimate local concern, such as environmental protection and resource conservation, are limited by the Commerce Clause.[48] In short, a state may not accomplish even legitimate goals "by the illegitimate means of isolating [itself] from the national economy."[49]

These basic and well-established principles of federal constitutional law take precedence over Washington's interest in implementing mitigation requirements for the Project. Washington State has few commercially viable coal reserves as compared with reserves of landlocked states like Montana and Wyoming. Washington thus has little interest in regulating companies that own, produce and sell coal nationally or internationally. In addition, Ecology has never to our knowledge studied the life-cycle GHG emissions from other commodities or industries -- such as timber/wood products, commercial vehicle engine manufacturers, or airplane manufacturers -- let alone proposed to regulate life-cycle emissions from end-use of those commodities or industrial products overseas.

The impact of any decision to regulate, limit or prohibit coal exports through the Project -- i.e., by requiring 50% mitigation of end-use emissions or reduction in the volume of coal shipped through the terminal -- would fall entirely on those landlocked states and their industries and economies that have an interest in coal production. It would also burden navigation at Washington's borders in direct contravention of the Commerce Clause. Additionally, there is no demonstrable or verifiable benefit associated with a SEPA imposed mitigation requirement in comparison to the concrete and substantial interference on interstate commerce. In short, the mitigation conditions proposed in the Draft EIS would potentially have the effect of blocking coal exports due to changes in export volumes or increased cost of operation, which would violate the Commerce Clause and would be unconstitutional.

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[46] *Oregon Waste Sys.*, 511 U.S. at 98 (citations omitted). The Commerce Clause requires that some aspects of trade generally must remain free from interference by the States, and when a State "ventures excessively into the regulation of these aspects of commerce, it trespasses upon national interests . . . and the courts will hold the state regulation invalid under the Clause alone." *Kassel v. Consolidated Freightways Corp. of Delaware*, 450 U.S. 662, 669, 101 S.Ct. 1309, 67 L.Ed.2d 580 (1981) (holding Iowa limitations on the length of freight trucks transporting goods within the state unconstitutional under the Commerce Clause) (internal citations and quotations omitted).

[47] *City of Philadelphia v. New Jersey*, 437 U.S. 617, 624, 98 S.Ct. 2531, 57 L.Ed.2d 475 (1978) (declaring unconstitutional—in the face of environmental protectionist arguments—a New Jersey law prohibiting importation of solid and liquid wastes generated outside the state) (citations omitted).

[48] *Minnesota v. Clover Leaf Creamery Co.*, 449 U.S. 456, 471, 101 S.Ct. 456, 66 L.Ed.2d 659 (1981) (holding minor burdens associated with packaging requirements imposed on milk products allowed to continue to move freely across the Minnesota border were not unconstitutional where no approach with a lesser impact on interstate activities existed) (citations omitted). Laws designed to promote public health and safety "may further the [public] purpose so marginally, and interfere with commerce so substantially, as to be invalid under the Commerce Clause." *Kassel v. Consolidated Freightways Corp. of Delaware*, 450 U.S. 670.

[49] *City of Philadelphia*, 437 U.S. at 627.

The Commerce Clause also vests Congress with exclusive authority to regulate foreign commerce—a power "greater" than Congress's right to regulate interstate commerce.[50] Indeed, "[f]oreign commerce is pre-eminently a matter of national concern."[51] The Foreign Commerce Clause is designed to ensure the federal government "speak[s] with one voice when regulating commercial relations with foreign governments."[52] Ecology's proposed mitigation requirement on the Project for coal consumed in Asia, based on Ecology's belief that exporting coal will exacerbate GHG emissions, invades Congress's absolute power to regulate foreign commerce. It is not within Ecology's jurisdiction to limit international access to domestic resources that Congress has not deemed protected or limited.

For these reasons alone the review of potential GHG emissions from the use of coal in Asian must be limited to disclosure purposes only, and cannot be the basis of the exercise of SEPA substantive authority.

c. Without establishing nexus and proportionality there is no basis to exercise SEPA substantive authority

The U.S. Constitution's Fifth Amendment limits governmental authority to deny or condition permits. Specifically, when denying or conditioning a permit the government must demonstrate that its action (a) has an "essential nexus" to the permit, and (b) that the action is "roughly proportional" to the project's impacts.[53]

Washington courts apply the nexus and proportionality tests to restrictions, including those under SEPA, imposed on land development in Washington.[54] The agency imposing the restriction has the burden of proving that a SEPA mitigation condition satisfies the essential nexus and rough proportionality tests, or else the development condition constitutes an illegal tax, fee, or charge under RCW 82.02.020, or the Washington State Constitution.

Nexus is an essential component to the exercise of SEPA substantive authority because it establishes the relationship between a project's environmental impact and an agency's "individual determination" that

[50] *Japan Line, Ltd. v. Los Angeles Cnty.*, 441 U.S. 434, 448, 99 S.Ct. 1813, 60 L.Ed.2d 336 (1979) (striking down a California tax on instrumentalities of foreign commerce because the tax jeopardized federal uniformity with respect to foreign trade).
[51] *Japan Line, Ltd.*, 441 U.S. at 448. *See also Chemical Waste Management, Inc. v. Templet*, 770 F. Supp. 1142, 1152 (M.D. La. 1991) (declaring unconstitutional Louisiana statues prohibiting imports of hazardous wastes generated in Mexico).
[52] *Japan Line, Ltd.*, 441 U.S. at 449.
[53] *See Nollan v. California Coastal Commission*, 483 U.S. 825, 837 (1987) (exactions violate the Takings Clause of the Fifth Amendment unless there is an "essential nexus" between the exaction and the public impact of the proposed development) and *Dolan v. City of Tigard*, 512 U.S. 374 (1994) (an exaction of property must be "roughly proportional" in nature and extent to the impact of the proposed land development).
[54] *See Trimen Dev. Co. v. King County*, 124 Wn.2d 261, 274, 877 P.2d 187 (1994) (citing *Dolan*, 512 U.S. 374); *City of Olympia v. Drebick*, 156 Wn.2d 289, 301-03, 126 P.3d 802 (2006).

a proposed restriction is necessary to address that impact.[55] Most simply, nexus is about causation and the mitigation required to address an impact caused by a proposed project.

Similarly, rough proportionality requires that the type and amount of mitigation is related in nature and extent to the proposed project's impact. To establish proportionality, the condition must be "impact specific" and the agency must "base its condition on an "evaluation of the proposed development's demonstrated impact."[56]

The Draft EIS proposes that a mitigation condition requiring a 50% reduction in emissions associated with the Project is necessary to address significant impacts from the Project. However, there is no basis to establish an essential nexus because the Draft EIS cannot on the basis of existing science or law demonstrate that emissions attributed to the Project will cause a discernable environmental impact in Washington State – i.e., there is no nexus between the proposed mitigation requirement and an environmental impact caused by the Project.

The proposed mitigation also fails the rough proportionality test. The Draft EIS assumes without any rationale or justification that mitigating 50% of incremental new GHG emissions from the Project will mitigate – below a level of significance – the adverse climate change impacts presumably caused by the Project. It also fails because the identified range of emissions is so large that picking one amount is the product of speculation. Specifically, if the Project actually reduces GHG emissions, as predicted by two of the Draft EIS GHG scenarios and sets of assumptions, then no amount of mitigation is proportional. Similarly, mitigation based on the high end scenario is not roughly proportional if emissions are moderate.

The Final EIS cannot address – with any degree or validity – the inherent uncertainty of a long-term commodities market and energy production prediction by simply reducing the mitigation required to 50% of the GHG emissions purportedly caused by the Project. And when that prediction is made even more questionable by its use of an array of demonstrably incorrect assumptions, the mitigation requirement loses all grounding in reality. Rather than demonstrating that a particular increment of future increased emissions from the burning of coal will be caused by the Project, the 50% mitigation requirement is an implicit recognition that there is too much variability in potential outcomes to predict with reasonable certainty whether the Project will have any effect at all on overall net global GHG emissions.

The statutes and regulation cited in the Draft EIS to justify the 50% mitigation figure are not applicable to Project permitting decisions. By importing mitigation requirements into the Draft EIS from other statutory programs that were not intended to apply to dock permitting decisions, Ecology is attempting to usurp the authority of the Legislature.

There is simply no rational basis for Ecology to conclude that a 50% mitigation requirement for the GHG emissions attributed to the Project is close to roughly proportional when the Draft EIS GHG analysis is

[55] *Compare Trimen Dev. Co.*, 124 Wn.2d at 275 *with Isla Verde Int'l Holdings, Inc. v. City of Camas*, 146 Wn.2d 740, 745-746, 49 P.3d 867 (2002).
[56] *Citizens Alliance v. King County.* 145 Wn. App. at 654, 668.

based on a set of speculative scenarios that are deemed "plausible and reasonable" or "most probable" but result in vastly different predicted new GHG emissions.[57]

d. Conclusion

The Draft EIS must acknowledge the substantial uncertainty that permeates the GHG emissions analysis and limited this discussion to disclosure purposes only.

The Draft EIS and the Final EIS cannot establish a causal link between the purported GHG emissions and an environmental impact that would be avoided when compared to the No Action Alternative. As such, the mitigation proposed in the Draft EIS is incapable of demonstrating how it has an essential nexus or is roughly proportionate to the identified impacts. Nexus and proportionality are essential to the exercise of substantive authority to impose mitigation; and a failure to demonstrate either violates SEPA and the U.S. Constitution. The Final EIS, therefore, should remove the proposed GHG mitigation requirements for the Project.

C.12 Cumulative Impacts

The discussion of cumulative impacts in Chapter 6 at times contradicts itself (is there a cumulative impact or not?), seems to double-count some impacts relating to transportation, and includes impacts that are speculative or inconclusive.

Table 6-1 Resources Potentially Contributing to Cumulative Impacts on Page 6-2 of the Draft EIS shows a potential cumulative impact on every element of the environment with the exception of groundwater. Yet the sections that follow show that there would be no cumulative impacts for several elements A few examples are 6.3.1.6 Hazardous Materials, 6.3.2.1 Geology and Soils, and 6.3.2.3 Wetlands.

In other elements of the environment, impacts appear to be double-counted because background growth in transportation is intended to accommodate future projects such as this Project, yet all of the Project impacts are added on top of the background forecast to result in a cumulative impact. Examples are in rail transportation, rail safety, and vehicle transportation. In 6.3.3.1 Rail Transportation, Page 6-35, Table 6-5, Projected Trains per Day on Reynolds Lead and BNSF Spur in 2038 by Scenario. Background growth does not account for any traffic from MBT-Longview Project. On Page 6-38: Table 6-6. Projected 2038 Train Volumes in Washington State by Scenario. Background growth does not account for any traffic from MBT-Longview Project. In 6.3.3.2 Rail Safety, page 6-41:*The 2038 predicted number of freight train accidents in Cowlitz County (BNSF main line, BNSF Spur, and Reynolds Lead) is 7.2 per year without Proposed Action-related trains (Cumulative No-Action scenario), and 8.1 with Proposed Action-related trains (Cumulative Proposed Action scenario). The predicted number of loaded coal train accidents is 1.5 per year with Proposed Action-related trains.* The forecasted growth in train traffic should account for some or all of the coal trains.

[57] Millennium Bulk Terminals—Longview SEPA Environmental Impact Statement: SEPA Coal Market Assessment Technical Report, p. 5-3-5.

And in 6.3.3.3 Vehicle Transportation, traffic growth is projected at 2 percent per year: Page 6-42: "*Background traffic was estimated by developing a linear growth rate between existing and forecast traffic volumes in the immediate area. Traffic volumes are forecast to increase at a rate of 2% annually. For comparison purposes, a 2% annual growth rate was applied to traffic count data to reflect baseline traffic conditions in the SR 432 Highway Improvements and Rail Realignment Study (Cowlitz-Wahkiakum Council of Governments 2014). The 2% annual growth rate was applied to the 2028 No-Action scenario traffic volumes for 10 years to develop 2038 No-Action Cumulative Proposed Action scenario traffic volumes. Vehicular traffic related to the Proposed Action was added to the 2038 No-Action Cumulative Proposed Action scenario to develop the 2038 Cumulative Proposed Action scenario traffic volumes".* The 2% growth factor should account for some if not all of any traffic from resulting from redeveloping the Project site.

There are also several places in the cumulative impact analysis where the analysis includes impacts that are speculative and subjectively inconclusive: Some examples include:

6.3.1.3 Aesthetics, Light, and Glare: Page 6-20 lists the projects included in the cumulative analysis of aesthetics, light and glare: *The following cumulative projects are located in this study area: Barlow Point Master Plan Project, Riverside Refinery, Washington Energy Storage & Transfer, SR 432 Rail Realignment and Highway Improvement Project, Reynolds Lead and BNSF Spur Improvements, and the Kelso Martin's Bluff Rail Improvement Project.* None of these projects have progressed to the point of having design information on which to base a study of aesthetics, light and glare. Yet, on page 6-21, the Draft EIS concludes: *Overall, the Proposed Action, in combination with the cumulative projects, would contribute to cumulative impacts related to aesthetics, light, and glare by adding to the concentration of industrial features along the Columbia River visible to viewers at rural, residential, and natural viewpoints.* Given that there is no basis for the conclusion and it is highly speculative without seeing lighting designs, "would contribute" should be changed to "could contribute."

6.3.1.4 Cultural Resources: Page 6-21 of the Draft EIS, *During operations, the Proposed Action could affect onshore archaeological resources if increased shoreline erosion, due to wakes from Proposed Action-related vessels, altered or destroyed the landforms on or in which resources are located.* ***Although a shoreline analysis concluded that impacts on archaeological sites along the lower Columbia River were not likely to result from an increase in project-related vessel traffic,*** *other cumulative projects (Table 6-4) would increase vessel traffic in the Columbia River. Therefore, the Proposed Action,* ***in combination with the cumulative projects, could contribute to cumulative impacts on archaeological resources related to shoreline erosion from vessel wakes.****(emphasis added)* This is speculative and not supported by the shoreline analysis.

6.3.1.5 Tribal Resources: Pages 6-22 through 6-23. "*Operation of the Proposed Action would also affect tribal resources through activities that cause physical or behavioral responses in fish or that affect aquatic habitat. These impacts could reduce the number of fish available for*

harvest by the tribes in areas upstream of Bonneville Dam. Cumulative projects would also introduce vessel traffic and other activities that may cause physical or behavioral responses in fish or affect aquatic habitat. Therefore, the Proposed Action, in combination with the cumulative projects, would contribute to cumulative impacts on tribal fish resources." The text on page 4.7-34 of the Draft EIS describes project-related vessel traffic increases as an impact that ***could*** cause behavioral responses, not ***would***. The cumulative impact analysis appears to string together a series of information that is inconclusive and determine it would be an impact rather than could be an impact, and the text should be revised to use the word "could."

6.3.3.2 Rail Safety: On page 6-41, the Draft EIS concludes: "*Within Washington State, the predicted number of freight train accidents is approximately 98 per year without Proposed Action-related trains, and 110 accidents per year with Proposed Action-related trains. The predicted number of loaded coal train accidents in Washington State is approximately19 per year*." As was noted above, there is no evidence that coal trains would have a different accident rate than other commodities, and if the number of accidents is tied strictly to the number of trains using the line, then the accident rate predicted for the with-Project Action-related trains in 2028 would be the same as in year 2035 without the Project Action- related trains.

6.3.3.4 Vessel Transportation: The Draft EIS acknowledges that "*the likelihood of a vessel allision is low in the Columbia River because there are few impediments close to the edge of the navigation channel."* (page 6-56) It also acknowledges the "*factors that influence the potential for incidents during vessel transport are complex but are driven largely by changes in the pattern of vessel traffic, particularly those vessels limited to the navigation channel (i.e., deep-draft vessels).*" (page 6-56) "*The modeling predicts approximately 26.30 incidents per year in 2038 Cumulative Proposed Action scenario conditions, compared to 24.70 incidents in 2038 Cumulative No-Action scenario conditions. Groundings (powered and drift) are projected to account for 21.84 of the incidents (17.30 powered groundings and 4.54 drift groundings). The Proposed Action's incremental contribution to this cumulative impact would be small, approximately 1.6 incidents per year over the 2038 Cumulative No-Action scenario."* (page 6-57). And then at the end of the section, the Draft EIS writer appears to throw in several other elements of the environment without a clear conclusion, yet states that "*In general, the increase in deep-draft vessels associated with the Proposed Action and cumulative projects would result in the increased potential for vessel-related cumulative impacts to occur."* The conclusion that additional coal terminals would result in even greater induced demand in Asia and increased GHG emissions presumes that the Draft EIS coal markets and GHG analysis provides reasonably certain conclusions concerning the effects in Asia of the Project. Because all commodities market and energy use predictions extending out over two decades are inherently speculative, the draft EIS should conclude that it is not possible to predict with any reasonable degree of certainty the effect in Asia of multiple new coal export terminals being constructed in the U.S.

6.3.3.8 Greenhouse Gas Emissions: The GHG analysis in the Draft EIS is highly speculative, and makes use of incorrect outputs, and this approach of using highly speculative information is continued in the discussion of cumulative impacts. On page 6-71: "*The coal market assessment found that the operation of the planned coal export terminals in Table 6-27 would increase the domestic coal prices and decrease domestic coal consumption, resulting in a decrease in domestic greenhouse gas emissions. Natural gas consumption would increase as it would be used as a substitute for coal. Therefore, the net domestic greenhouse gas emissions would decrease. However, internationally, Asian coal displacement coupled with induced demand from reduced international coal prices would outweigh any reduction in domestic emissions and would result in an increase in international greenhouse gas emissions. Induced demand under the Cumulative Proposed Action scenario would be higher than the Past Conditions (2014) scenario due to the effects of all coal export terminals.*" The conclusion that additional coal terminals would result in even greater induced demand in Asia and increased GHG emissions presumes that the Draft EIS coal markets and GHG analysis provides reasonably certain conclusions concerning the effects in Asia of the Project. Because all commodities market and energy use predictions extending out over two decades are inherently speculative, the Draft EIS should conclude that it is not possible to predict with any reasonable degree of certainty the effect in Asia of multiple new coal export terminals being constructed in the U.S.

D. Table of Corrections

Attached as Attachment 2 is a table identifying suggested corrections or revisions to the Draft EIS. While not substantive in nature, many of these corrections could have been avoided with greater transparency during the Draft EIS drafting process. These changes will correct misstatements, clarify analyses, and/ or perhaps strengthen the analytical foundation for conclusions. The analysis completed to date for the Draft EIS is sufficient and new analysis does not need to be performed for the Final EIS.

E. Closing

MBT-Longview appreciates the efforts taken by the County and Ecology to reach the Draft EIS publication milestone. We recognize the effort that your teams have expended in the preparation and publication of the document. This Draft EIS is an exceptionally thorough document supported by extensive public participation during the 45-day public comment period, which included three public hearings. We remain committed to working with you to swiftly arrive at the next milestone – the issuance of the Final EIS.

SEPA requires a "reasonably close causal relationship" between a project and a potential impact before an EIS must study or recommend mitigation for that impact. The Final EIS should narrow the recommendation of mitigation measures to those impacts that are clearly caused by the Project and assign impacts that would happen without the Project to the No-Action Alternative. Areas of indirect

impacts that are clearly outside of the Applicant's control should be included in the Final EIS for disclosure purposes only.

We take specific issue with the inclusion of mitigation for remote and speculative impacts and the lack of disclosure where there is substantial uncertainty in the studies, and with the attribution to the Project of impacts that will occur even with the No-Action Alternative. The No-Action Alternative should properly account for growth in rail, vessel traffic, demolition of the historic buildings and climate change – *as all will occur with or without the Project*. The incremental difference between the No-Action Alternative (including proper accounting for background growth in transportation) and the Project should be clearly described for the reader. Only impacts clearly created by the Project should be mitigated, and the mitigation measures must be reasonably related to the proposal and reasonably capable of being achieved.

Again, we thank you for giving us the opportunity to submit comments on the Draft EIS. We look forward to the finalization of the EIS by the co-leads in 2016.

Sincerely,

Millennium Bulk Terminals – Longview



William Chapman
President and Chief Executive Officer



Kristin Gaines
Vice President, Environment

Attachments:

Attachment 1 – Legal Framework
Attachment 2 – Table of Corrections
Attachment 3 – Draft EIS Comments, Technical Response Analysis of Population-level Impacts on Tribal Fish Resources in Zone 6
Attachment 4 – Greenhouse Gas Technical Reports and Memoranda

ATTACHMENT 1 – LEGAL FRAMEWORK

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MEMORANDUM

TO: **ELAINE PLACIDO** **DATE: JUNE 13, 2016**
DIRECTOR, BUILDING AND PLANNING
COWLITZ COUNTY

SALLY TOTEFF
DIRECTOR, SOUTHWEST REGIONAL OFFICE
WASHINGTON STATE DEPARTMENT OF ECOLOGY

FROM: **JON SITKIN**

SUBJECT: **MILLENNIUM BULK TERMINALS-LONGVIEW'S COAL EXPORT TERMINAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (DRAFT EIS); LEGAL FRAMEWORK APPENDIX TO COMMENTS ON DRAFT EIS**

This memorandum addresses the legal framework of a proper Washington State Environmental Policy Act (SEPA) Environmental Impact Statement (EIS) impact analysis. It is to be read in conjunction with Millennium Bulk Terminals-Longview's substantive comments on the Draft EIS for MBT-Longview's proposed coal export terminal (Project) contained in its comment letter of the same date (Comment Letter).

A. LEGAL FRAMEWORK

1. SEPA-EIS Basics

A SEPA EIS is intended to evaluate potential significant, adverse environmental impacts, including direct, indirect, and cumulative effects that are reasonably foreseeable and proximately caused by a proposed project.[1] According to Ecology's SEPA rules, and as established in Washington case law, "significant" means a reasonable likelihood of more than a moderate effect on the environment.[2] "Impacts" are defined as "the effects or consequences of actions."[3] Washington courts have recognized that SEPA limits this analysis to probable significant impacts, not every conceivable impact.[4] Ecology's regulations explain "'[p]robable' means likely or reasonably likely to occur" and "is used to distinguish likely impacts from those

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[1] RCW 43.21C.031, WAC 197-11-792(2) (c).
[2] *See WAC 197-11-794.*
[3] WAC 197-11-752.
[4] *See Citizens v. Klickitat Cnty,* 122 Wn.2d 619, 641, 860 P.2d 390 (1993), *op. revised*, 866 P.2d 1256 (1994); and *Cheney v. City of Mountlake Terrace*, 87 Wn.2d 338, 344, 552 P.2d 184 (1976).

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that merely have a possibility of occurring, but are remote or speculative."[5] An EIS impact analysis must satisfy the "rule of reason" standard.[6]

The Draft EIS is to be confined to "*only* those probable adverse environmental impacts that are significant."[7] Further, the Draft EIS analysis of probable significant adverse impacts is required to be limited to those impacts that are proximately caused by the proposal.[8] To ensure that the SEPA analysis focuses on only those impacts that are proximately caused by a proposed project, SEPA requires that a "no-action alternative" be simultaneously analyzed in order to distinguish between the significant environmental effects that will be proximately caused by a proposal and those impacts that will occur in the event the proposal is not permitted. An EIS is not to consider indirect or cumulative effects that are remote or speculative, or where the chain of causation relies on too many independent actions.[9] The proximate cause test requires reasonable foreseeability.[10] SEPA impact analysis requires consideration of only probable significant impacts because an analysis of "remote and speculative" impacts would be insufficiently reliable for decision-makers.[11]

Where analysis has "gaps in relevant information or scientific uncertainty concerning significant impacts, agencies shall make clear that such information is lacking or that substantial uncertainty exists" (emphasis added).[12] Scientific uncertainty exists when there are an increasing number of variables that have independent effect to cause the link between the Project and any indirect and cumulative impacts to become more distant and remote.

"[Mitigation] will depend upon the specific impacts, the extent to which the adverse impacts are attributable to the applicant's proposal, and the capability of applicants or agencies to control

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[5] WAC 197-11-782.
[6] See *Mountlake Terrace v. Cheney*, 87 Wn. 2d 338, 244 (1976). ("The 'rule of reason' is a 'broad, flexible cost-effectiveness standard and is determined on a case by case basis, considering all of the policy and factual considerations reasonably related to SEPA's terse directives.'" quoting R. Settle, *The Washington State Environmental Policy Act: A Legal and Policy Analysis* § 14(a)(i) (4th ed.1993)).
[7] RCW 43.21C.031 (2) (emphasis added); *see* also WAC 197-11-408.
[8] The SEPA EIS scope is both governed by and defined through principles of causation. SEPA imports the NEPA proximate cause standard. The U.S. Supreme Court explained that a direct, an indirect, or a cumulative impact is within the scope of the NEPA impact analysis *only if* there is "a reasonably close causal relationship between the environmental effect and the alleged cause." *Department of Transportation v. Public Citizen*, 541 U.S. 754, 752, 124 S. Ct 2204, 159 L.Ed. 2d 60 (2004). (internal quotation marks and citation omitted, emphasis added). *See* also *Ecology, Guidance for Ecology Including Greenhouse Gas Emissions in SEPA Reviews*, at 3 (June 3, 2011) ("GHG Guidance") (citing *Public Citizen*, at 767).
[9] *See*, e.g., *Ctr for Biological Diversity v. U.S. Dept of Hous & Urban Dev.*, 541 F. Supp. 2d 1091 (D. Ariz. 2008),
[10] "Some effects that are 'caused by' a change in the physical environment in the sense of 'but for' causation, will nonetheless not fall within [NEPA] because the causal chain is too attenuated." *Metro. Edison Co. v. People Against Nuclear Energy*, 460 US 766, 774 (1983). See also *id.* at 767.
[11] *Cascade Bicycle Club v. Puget Sound Regional Council*, 175 Wash. App. 494, 509, 306 P.3d 1031 (2013).
[12] WAC 197-11-080(2).

the impacts in each situation."[13] "Mitigation measures shall be reasonable and capable of being accomplished."[14] Agencies shall also consider whether local, state, or federal requirements and enforcement would mitigate an identified significant impact.[15]

Traditional Impact Analysis - Direct and Indirect Impacts of Construction and Operation

The Draft EIS's evaluation of the direct and indirect impacts of the construction and operation of the terminal is straightforward and satisfies SEPA requirements; the Draft EIS fully evaluated all such impacts (i.e., gave a hard look). In regard to these impacts, the Draft EIS impact analysis is consistent with what has been uniformly conducted for other projects for decades. Although the conclusions in these areas are accurate and no further study is necessary, there are technical corrections that have been noted in the technical appendix. *See Attachment 2.* The Draft EIS also recognized the vast array of mitigation measures built into the terminal design as well as construction and operational plans and procedures that will mitigate potential significant adverse impacts arising at the site and neighboring areas. The Draft EIS concluded that with the Project design and operational plans developed by MBT-Longview, there are no significant adverse impacts resulting from the construction and operation of the Project at or near the site.

Unprecedented Expanded Impact Analysis

In this Draft EIS, the impact analysis has ventured far beyond the proper limits of SEPA impact analysis. Portions of the Draft EIS evaluate potential impacts that (a) are not proximately caused by the Project; (b) are not "likely or reasonably likely to occur" or speculative, and may not happen at all; and (c) may happen whether or not the proposed Project goes forward. In these instances, the Draft EIS did not include an adequate disclosure of substantial uncertainty in the studies. The inclusion of potential mitigation measures for impacts that are not proximately caused by the Project invites the agencies to exceed their regulatory authority.

This is particularly evident in the unprecedented scope of Ecology's attempt to review greenhouse gas (GHG) emissions from the use of a commodity, and the use of the statewide rail system to deliver goods, products or a commodity to a port terminal. The Draft EIS makes conclusions about impacts without disclosing the substantial uncertainty that exists in its study of those impacts. For instance, this Draft EIS identifies GHG emissions occurring outside of the State of Washington, on the other side of the Pacific Ocean, as an *offsite* unavoidable and significant indirect impact. To arrive at this conclusion, Ecology has undertaken a novel and unprecedented analysis of emissions based primarily on speculation and inconsistent assumptions.[16] In the GHG emissions analysis, as well as the vessel, rail transportation, and

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[13] WAC 197-11-060(4)(e).
[14] RCW 43.21C.060.
[15] WAC 197-11-660(1)(e).
[16] Cowlitz County's August 19, 2014 letter to Millennium Bulk Terminals-Longview, LLC identified that Ecology was taking a far broader scope of review of greenhouse gas emissions in the EIS than was supported by Cowlitz County. Thus, the analysis of GHG emission occurring outside of Cowlitz County is referred to as Ecology's analysis.

rail safety sections (all of which are discussed in greater detail in the Comment Letter, as well as in this appendix), the Draft EIS violates the SEPA threshold analytical requirements of causation by attributing impacts to the Project that are not proximately caused by the Project, and that are remote and speculative. The Draft EIS analysis of GHG emissions and climate change impacts is extraordinarily speculative and is based primarily on an analysis that simply stacks a series of assumptions on top of one another to reach a result for each of the four coal market model scenarios that is the basis of the GHG emissions analysis. Each of these scenarios, independently and especially if evaluated together given their divergent predictions, reveal the inability to forecast long-term changes in commodity and energy markets, and, in particular, global commodity markets, with the degree of precision required for impact analysis under SEPA. No amount of coal-market analysis can be done that would discern a level of incremental new-coal combustion emissions caused by the Project with sufficient certainty to justify the imposition of mitigation requirements.

Long-term commodities projections simply cannot be made with certainty as even short-term commodity prices are subject to major gyrations in major commodities trading exchanges. These markets are speculative precisely because commodity prices are unpredictably variable. The recent rapid decline in gas prices from the time the Draft EIS analysis was completed to the time the Draft EIS was published provides a perfect illustration. The "most probable" GHG emissions scenario identified by the EIS depends on gas prices increasing over time so that gas will not displace coal when coal prices increase. This scenario predicted a gas price of $4.4/MMBTU in 2016, with prices rising from there. Instead, prices have dropped, with the 2016 average price to date being $2.0/MMBTU. Despite its own commodity price projection being clearly inaccurate before the Draft EIS was even published, the Draft EIS concludes that its 20-year commodity forecast was sufficiently precise to support a GHG mitigation requirement.

As addressed in the Comment Letter, any GHG emission analysis, including that provided in the Draft EIS, is not capable of demonstrating with any degree of certainty that the Project will result in greater GHG emissions than would otherwise occur. Ecology's GHG analysis does not and cannot establish a causal link between the Project and increased GHG emissions from the use overseas of a product that is abundantly available from other global sources. Notably, a different conclusion was reached by a federal agency conducting a similar environmental review using the same econometric techniques, underscoring the speculative and inconsistent nature of this analysis.[17]

The Final EIS must recognize that forecasting global commodity and energy markets is fundamentally speculative, and based upon uncertain futures. The Final EIS should not attempt to predict what is inherently unpredictable, and, at a minimum, must disclose the unpredictable nature of commodity and energy market forecasting. The final EIS should limit its GHG analysis to emissions from the Project itself and related nearby operations as Cowlitz County and the U.S. Army Corps of Engineers have both determined was appropriate for the scope of their

[17] *See* Tongue River Railroad Environmental Impact Statement.

analyses. To the extent Ecology determines that information on GHG emissions from the use of the exported coal should be included in the Draft EIS, that analysis should be provided solely for the purpose of disclosing a range of potential, yet uncertain outcomes. There is no need to re-do the analysis with alternative assumptions, as the Draft EIS already brackets and discloses a very wide range of potential outcomes. Because there is no reliable way to even discern within a reasonable range of certainty whether permitting the Project will result in increased or decreased overall net GHG emissions from coal combustion, there is no basis for conducting additional coal-market and GHG emissions analyses to further refine the guesses provided in the Draft EIS.

Similarly, impacts resulting from train or vessel traffic are also affected by the inherent difficulties with making accurate forecasts of train or vessel traffic over the study period. It is speculative and not reasonably foreseeable to conclude that construction of the Project will cause train or vessel traffic to increase. Rail and vessel traffic naturally ebbs and flows due to a variety of factors, such as future market conditions, competing modal choices, and a diverse set of rail customers with different demands for rail services, etc. As a system, the railroad is designed, permitted, and constructed to operate at capacity, with that capacity managed by its owner/operator, as it has traditionally occurred for decades. Indeed, as the Draft EIS Technical Reports and the Draft EIS noted, these impacts resulting from the rail system operating at capacity will occur with or without the Project, and will be avoided or reduced to below a level of significance through infrastructure improvements or transportation management by the parties who own or operate these transportation systems. Due to the dynamic nature of traffic, no overall increase in rail traffic above historical levels may be attributed to the Project.

While disclosing that there is substantial uncertainty with regard to any forecast for future rail traffic, even using the most current forecasts as to train numbers, the Washington State Rail Plan forecasts that rail capacity will be reached by 2035 *without* this Project. Because these impacts will occur with or without the Project, SEPA requires that they be studied as part of the no-action alternative. An impact wholly associated with a train traffic volume level already predicted and evaluated in Washington should, where logic and fairness apply, be attributed to the No-Action Alternative.

The analysis in the Draft EIS concludes that adding the trains bound for the Project site will result in mainline rail capacity being reached earlier than 2035 and that in itself was determined to be a significant indirect impact. This conclusion is in error, and must be revised. Reaching capacity a few years sooner than the State Rail Plan predicts is not a significant indirect impact. Temporal or timing difference is not a significant adverse impact. The DEIS must disclose that the impact of reaching capacity earlier than 2035 is based upon speculation and that substantial uncertainty exists due to the complexities associated with predicting future rail use due to uncertainties in future rail demand. The Draft EIS should adjust their conclusion to note that adding the trains associated with the Project may result in rail capacity being reached earlier than 2035, but that the timing difference is not a significant indirect impact.

With regard to vessel traffic, a similar analysis applies, as addressed in the Comment Letter. Vessel traffic ebbs and flows, fluctuating with the market, similar to rail traffic. It is speculative to attribute an overall increase in vessel traffic on the Columbia River directly and solely to the Project. Additional overall vessel traffic may result, though overall vessel traffic in the Columbia River could also decline due to factors outside of MBT-Longview's control. The data shows that, if historical shipping levels return with the Project, such levels would be similar to historical levels. The only reasonable conclusion in the Draft EIS should have been that the Project would not cause a probable significant impact to the navigability of the Columbia River, the function of the Columbia River as a system of commerce (both interstate and foreign commerce), or to the capacity of the Columbia River System. Mitigation measures should not be proposed in the Final EIS due to the lack of nexus between the adverse impacts attributable to the Project and the capability of MBT-Longview to control the impacts.

2. No-Action Alternative/Reasonable Alternatives

SEPA also requires that a "no-action alternative" be analyzed in order to distinguish between the significant environmental effects that will be proximately caused by the Project and those impacts that will occur whether or not the Project is permitted. The "no-action" alternative is used to compare baseline effects against the effects of the proposal and its reasonable alternatives.[18] The lead agency is "required to evaluate only the no-action alternative plus other reasonable alternatives for achieving the proposal's objectives on the same site."[19] Reasonable alternatives to the Project are evaluated under the "rule of reason" and considerations of feasibility.[20] For instance, with respect to rail capacity, rail safety, vessel transportation, and vehicle transportation, SEPA analysis requires a description of the baseline conditions, which include both existing conditions and the conditions that will exist in the future based on anticipated growth and development. The baseline conditions can then be compared to the anticipated conditions that will exist if the Project is implemented.

The Draft EIS should have examined those impacts proximately caused by MBT-Longview's Project as compared to impacts that would result whether or not MBT-Longview's Project is approved (i.e., impacts identified in the No-Action Alternative). The Draft EIS did not properly account for anticipated growth in the use of transportation infrastructure and systems in the No Action Alternative in making these comparisons.

Examples within the EIS where the No-Action Alternative failed to account for anticipated growth in the use of transportation infrastructure are addressed in the Comment Letter. Examples are summarized here to put the substantive comments in context with SEPA's legal requirements:

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[18] *See* WAC 197-11-786 and WAC 197-11-440(5)(d).
[19] WAC 197-11-440(5)(d); *Toandos Peninsula Assoc. v. Jefferson County*, 32 Wn. App. 473, 483-484 (1982); accord *Weyerhaeuser v. Pierce County*, 124 Wn.2d 26, 38-39, 873 P.2d 498 (1994).
[20] *Weyerhaeuser*, 124 Wn.2d at 38, 873 P.2d at 504. *See* also, *Citizens Alliance To Protect Our Wetlands v. City of Auburn*, 126 Wn.2d 356, 362, 894 P.2d 1300, 1304 (1995) and *Klickitat Cy. Citizens Against Imported Waste v. Klickitat Cy.*, 122 Wn.2d 619, 633, 860 P.2d 390, 399 (1993).

i. The following are four initial examples of analytic errors in the Draft EIS regarding rail transportation capacity. First, the Draft EIS does not recognize that the rail system in the United States and the State of Washington is managed to serve customers; the owners seek to operate the system at full capacity, irrespective of any specific commodity or demand for access to the railroad system. The very nature of the managed rail system, as recognized by WSDOT in the State Rail Plan, is that there may be capacity constraints, but the system is not physically capable of exceeding capacity. Being at or near capacity is not a significant adverse impact caused by a port facility. Second, the analysis in the Draft EIS assumes a growth in train traffic between 2015 and 2028. It then assigns all of the train trips to the MBT-Longview facility as additional trips not accounted for in the background growth. *See* Table 5.5-5 *Infrastructure Capacity and Projected Rail Traffic* on page 5.5-18 of the Draft EIS. Because the Project is proposing to use only existing rail capacity, the effects of such rail use should be accounted for as part of the No Action Alternative as rail use on the mainline is already authorized and does not identify specific source, destination or commodity. MBT-Longview's proposed facility operation is not the proximate cause of rail impacts or the rail system potentially reaching capacity in the future. Third, the State Rail Plan recognizes that there are multiple factors that contribute to the rail system reaching capacity constraints, none of which can be ascribed to a particular commodity or transportation infrastructure facility. The Draft EIS erroneously seeks to ascribe the rail system reaching capacity constraints in 2028 to the Project. Fourth, as with vessel transportation, the temporal or timing difference between the rail system being projected to reach capacity constraints in 2028 is speculative, and is not a significant impact. The substantial uncertainty of the rail forecast should be disclosed, and the increase in the MBT-Longview facility traffic cannot be considered a significant adverse impact. The Final EIS must correct these errors by affirmatively stating that the rail system reaching capacity constraints is not a probable significant adverse impact caused by the Project. Nor is it something that MBT-Longview can control. The Final EIS should also reflect that the rail system is managed by the owners of the system to assure that its customers' needs are met and that capacity constraints cannot be exceeded.

ii. Similar to the vessel transportation impact analysis in the Draft EIS, increases in vessel traffic on the Columbia River will continue to occur whether or not the Project is permitted. The following are four initial examples of errors in the Draft EIS regarding vessel traffic. First, the Draft EIS estimates that 840 vessels would be loaded and travel the Columbia River per year. The Draft EIS should recognize that this vessel traffic, in addition to existing levels, would be similar to historical traffic levels of shipping on the Columbia River, and that such levels are not a significant adverse impact. Second, under

normal traffic modeling, the projected future growth factor would account for projects, such as MBT-Longview's Project, occurring (thus contributing to the future growth in volume), but the No-Action Alternative in this Draft EIS appears to take the future growth number and double count by adding *all* of the traffic generated by the Project. The result is to over-estimate Project impacts. Third, even with the Draft EIS's failure to properly account for additional trips in the background growth, the only difference between the forecasts in the No-Action Alternative and the Project is that the capacity constraints are to be reached at an earlier point in time. Again, temporal or timing difference is not a significant adverse impact. Fourth, capacity and vessel traffic on the Columbia River is managed to avoid capacity constraints by the Columbia River Pilots. Thus, the system is managed to operate within capacity levels by third parties outside of MBT-Longview's control. The Final EIS must correct these errors by acknowledging substantial uncertainty in its vessel study, that even the high volume modeled scenario does not show a probable significant adverse impact because the river system does not exceed historical capacity constraints, and vessel traffic is not controlled by MBT-Longview. Capacity and vessel traffic on the Columbia River is managed to avoid capacity constraints by the Columbia River Pilots.

3. Cumulative Impacts

"Cumulative impacts" are "the impacts[s] on the environment which result from the incremental impact[s] of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions."[21] If, however, a proposed project is not likely to result in significant direct or indirect impacts, it cannot result in significant cumulative effects. Put otherwise, a cumulative-effects analysis of a particular environmental effect will not serve the purpose of promoting an informed assessment of environmental considerations and policy choices in situations where the underlying direct and indirect effects analysis demonstrated an absence of significant environmental effects. Further, a cumulative impacts analysis lends itself to speculation as the results are affected by a number of independent and uncertain factors that cause any link between the Project and any cumulative impacts to become more distant and remote.

An example of the Draft EIS's errors in considering cumulative impacts is its incorrect statement that the Project "*would*" affect tribal resources as a result of rail traffic "delaying tribal fishers' access to traditional fishing locations and delivery of fish to buyers." Draft EIS at 6-22. In fact, Chapter 3.5-14 concludes that the Project "*could*" affect access to fishing sites due to increased rail traffic. The Draft EIS was careful not to attribute a level of "significance" to impacts on tribal fishing because the co-leads concede that "other factors besides rail operations affect fishing opportunities, such as the number of fishers, fish distribution timing and duration of fish migration periods and seasons." Draft EIS at 3.5-17. The fact that other cumulative actions

[21] 40 C.F.R. §1508.7; WAC 197-11-792(2) (c).

could also affect access to fishing sites does not change the outcome here and allow the co-leads to conclude that cumulative effects to tribal resources *"would"* occur. As demonstrated in Attachment 3 to the Comment Letter,[22] the Project will not result in significant adverse effects on tribal resources. The Draft EIS concluded that the Project *would* contribute to cumulative impacts on tribal resources by aggregating the *de minimis* - to non-existent effects of the Project on tribal resources with potential effects from other projects that the co-leads speculate might impact tribal resources in Zone 6. Draft EIS at 6-22-6-23. The Final EIS should clarify that any impacts to tribal resources from the Project—whether from direct, indirect, or cumulative effects—are not significant. The Final EIS should affirmatively state that this is not a significant adverse impact caused by the Project requiring mitigation or, in the alternative, disclose that substantial uncertainty exists in its conclusion.

4. Ecology's Proposed Mitigation Measures Exceed the Agency's Authority and Limits on Mitigation Measures/Substantive Authority

SEPA provides limited authority to a permitting agency to exercise SEPA substantive authority. Mitigation measures must be "related to specific, adverse environmental impacts," provided the measures are "reasonable and capable of being accomplished."[23] The Draft EIS must evaluate how to avoid or mitigate probable significant adverse environmental impacts caused by the Project that would not otherwise occur under the No-Action Alternative. This effort requires more than merely pointing out an adverse impact that "could" result from a proposed action, as is the case with many of the potential significant adverse impacts identified in the Draft EIS. Where an adverse impact is caused by a proposed action, any proposed mitigation condition must be proportionate to the nature and extent of that specific impact. In addition, the agency must make an individual determination that any proposed permit condition imposed to avoid or mitigate an adverse impact is specifically necessary to address that impact. To the extent the impact and associated mitigation is based on information that is substantially uncertain, it must be disclosed.

As addressed in the Comment Letter, the Draft EIS primarily focused on impacts that are not proximately caused by the Project, or that are fundamentally speculative in nature, is an unprecedented application of SEPA. Ecology's approach to GHG emission analysis fails to apply SEPA in a manner consistent with law, policy or practice. Ecology fails to identify any impact related to climate change that would be caused by the MBT-Longview Project, and is fundamentally speculative in nature. Ecology fails to establish that the impacts of GHG emissions from coal being used in Asia would not occur without the MBT-Longview Project. It was an error for the Draft EIS to propose mitigation measures for speculative indirect impacts that are not caused by the Project. The Final EIS must recognize the limits of SEPA substantive authority, and state that an agency may not exercise SEPA substantive authority in relation to impacts that are speculative and/or are not proximately caused by a project.

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[22] *See* Grette Associates' "Analysis of Population-Level Impacts on Tribal Fish Resources in Zone 6".
[23] WAC 197-11-660.

The U.S. Constitution, including the Takings Clause of the Fifth Amendment, and Federal law[24] prevent Ecology or any other agency from applying its SEPA substantive authority to impose conditions that would discriminate against interstate commerce, burden foreign commerce, [25] or affect the development, infrastructure, or operation of the rail system.[26] In this case, the commerce in question is both among "many of the states" and "with foreign nations," and is, therefore, preempted from state regulation. The Draft EIS's suggestion that SEPA substantive authority could be exercised in relation to the interstate transportation network (rail and river systems of commerce) and mitigation of GHG emissions outside of the Project area imposes a significant burden on interstate and international commerce without the necessary link to the avoidance of specific intrastate impacts, thereby violating the dormant commerce clause.

SEPA requires that any mitigation measures must be reasonable, capable of being accomplished, and reasonably related to the proposal's adverse impacts. [27] With this Draft EIS, Ecology suggests that a regulatory agency could impose mitigation measures (a) without identifying an impact that is caused by a proposed project; (b) on speculative and uncertain impacts; (c) without regard to how the proposed mitigating measures will address such impacts; and (d) without discussing the technical feasibility and economic practicability of performing the mitigation measures. This precedent would have far-reaching implications for a vast array of projects in Washington State, such as transportation infrastructure projects that support domestic and foreign trade in agricultural goods and other products, not to mention the burden placed on small and large city and county agencies throughout the State of Washington.

5. Conclusion-Final EIS

The Final EIS should address the errors associated with the unprecedented expansion of the SEPA impact analysis as discussed herein and in the Comment Letter. The Final EIS should narrow the discussion to those significant adverse impacts that are clearly caused by the Project. The Final EIS must affirmatively state that the rail system and/or the Columbia River's commercial shipping traffic reaching capacity constraints are not probable significant adverse impacts caused by the Project. Nor is the capacity of these systems something that MBT-

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[24] The Surface Transportation Board ("STB") has exclusive jurisdiction with respect to railroad operations under the Interstate Commerce Commission Termination Act ("ICCTA"), specifically 49 U.S.C. § 10501(b).[24] The ICCTA preempts state and local regulation of railway operation.

[25] *Shaffer v. Heitner*, 433 U.S. 186, 199 (1977) ("'[T]he authority of every tribunal is necessarily restricted by the territorial limits of the State in which it is established [.]'" (citation omitted)). "[T]he State may regulate the activities of foreign corporations within the State but it cannot regulate or interfere with what they do outside." *St. Louis Cotton Compress C. v. Arkansa*s, 260 U.S. 346, 349 (1922).

[26] *City of Auburn v. Surface Transp. Bd.*, 154 F.3d 1025, 1031 (9th Cir. 1998).

[27] WAC 197-11-660. "Substantive authority and mitigation...(c) Mitigation measures shall be reasonable and capable of being accomplished. (d) Responsibility for implementing mitigation measures may be imposed upon an applicant only to the extent attributable to the identified adverse impacts of its proposal. Voluntary additional mitigation may occur." *West Main Associates v. City of Bellevue,* 49 Wn. App. 513, 742 P.2d 1266 (1987), *rev. denied*, 112 Wn.2d 1009 (1989). *See also Cougar Mountain Associates v. King County,* 111 Wn.2d 742, 765 P.2d 264 (1988).

Longview can control. The No-Action Alternative should properly account for growth in rail, vessel traffic, demolition of the historic buildings and climate change—*as all will occur with or without the Project*. The Final EIS must properly account for anticipated growth in the use of transportation infrastructure and systems in the No Action Alternative in making comparisons between the No Action Alternative and the Project, correcting the Draft EIS errors in this regard. The Final EIS should acknowledge and disclose the substantial inherent uncertainties and speculation associated with commodity forecasts, and the forecasts of future demands for use of the rail and vessel transportation systems. The Final EIS should not attempt to predict what is inherently unpredictable, and at a minimum must disclose the unpredictably nature of commodity and energy market forecasting. The Final EIS should limit its GHG analysis to emissions from the Project itself and related nearby operations. There is no need for the Final EIS to re-do the GHG emissions analysis with alternative assumptions, as the Draft EIS already brackets the range of coal market scenarios, and discloses a very wide range of potential yet uncertain outcomes. The Final EIS should limit the evaluation of SEPA's substantive authority and potential mitigation measures to those direct and indirect impacts specifically caused by the construction and operation of the Project, not the result of the transportation of commodities to or from the site, or the use of commodities shipped through the site.

ATTACHMENT 2 – TABLE OF CORRECTIONS

Attachment 2: Requested Text Corrections or Revisions

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
Summary	Page S-15, Cultural Resources, third paragraph	The sentence beginning "No archaeological resources…." should be modified to read "No precontact archaeological resources…."	Sentence not accurate as written
Summary	Page S-17, Tribal Resources, Operations	Operations under Tribal Resources: Revise the discussion to discuss increased freight trains in general, not specific to coal trains.	The reference to trains here should not be one specific to coal trains. The impact would occur due to more trains on the track, and this is a normal and expected result of expanding freight by rail, not specifically because of trains carrying coal to the MBT-Longview terminal.
Summary	Page S-17, Tribal Resources, Operations, second paragraph, first line	Replace "would" with "could".	The technical reports do not show or conclude that operation of the Proposed Action would result in impacts on tribal resources. See Attachment 2 *Technical Response Analysis of Population-level Impacts on Tribal Fish Resources in Zone 6* to Comment Letter.
Summary	Page S-17, Tribal Resources, Operations, third paragraph	Rewrite "Coal dust particles from trains related to the Proposed Action would" to "If coal dust particles were to come from trains…"	Modify so consistent with conclusions of coal dust portion, which do not establish dust particles coming from trains sufficient to cause impact.
Summary	Page S-21, Wetlands, Construction, first paragraph, last	The last sentence of the first paragraph should be revised to: "*Implementation of the proposed mitigation (Table S-2) to prepare a comprehensive wetland*	The DEIS states that implementation of proposed mitigation "**would**" compensate for the loss of wetlands that are

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	sentence	*mitigation plan <u>would</u> ~~could~~ off-set the impact.*"	filled completely. In next two sentences discussing partial filling of Wetland Y, the DEIS states that implementation of the proposed mitigation "**could**" off-set the impact. This should be changed to "**would**" to be consistent with previous statement regarding compensatory mitigation.
Summary	Page S-22, Groundwater, Operations, second paragraph	*"Water reused on site would be brought to Washington State Class A Reclaimed Water standards."*	What is the basis for this statement? The Applicant has not specified a need for this standard to be met because the water will be reused within the coal stockpile.
Summary	Page S-25 Fish	Introductory sentence above Construction. Add: *"The study area extends upstream of the project area to River Mile 67."*	The project area extends upstream of the project location to RM 67, which is correctly described in the text of the SEPA Fish Technical Report.
Summary	Page S-27, Wildlife, Construction, third paragraph	We suggest that the proposed mitigation measure to monitor wildlife during dredging and pile driving be removed. *"Implementing proposed mitigation to monitor wildlife for distress during pile-driving and dredging activities (Table S-2), implementing construction best management practices, and complying with permit conditions would minimize dredging impacts."*	We disagree that monitoring for wildlife distress during dredging or pile driving activities would be a necessary or effective mitigation measure. Impacts would be sufficiently minimized through timing restrictions of the work, construction BMPs, and noise mitigation measures.
Summary	Page S-28Wildlife,	We suggest that the proposed mitigation	We disagree that monitoring for

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Operation, first full paragraph	measure to monitor wildlife during dredging and pile driving be removed. *"Maintenance dredging could result in impacts on benthic organisms and wildlife as the initial-construction related dredging activities. Impacts would be minimized through implementation of construction best management practices, compliance with permit requirements, and proposed mitigation to monitor wildlife during dredging activities (Table S-2)."*	wildlife distress during maintenance dredging would be a necessary or effective mitigation measure. Impacts would be sufficiently minimized through timing restrictions of the work, construction BMPs, and noise mitigation measures. These other mitigation measures are deemed to be sufficient for other similar dredging projects on the river.
Summary	Page S-30 Rail Safety, Operations	"The predicted accident frequency would increase over baseline conditions in 2028 by approximately 22% in Cowlitz County and Washington State with trains related to the Proposed Action."	This impact is due to more freight trains on the track, not specific to coal trains; more importantly, perhaps, the impact is projected and expected to occur within a period of years afterwards under the No-Action Alternative.
Summary	Page S-34 Noise, Construction, first paragraph	*"The greatest noise levels would result from pile-driving, which could exceed applicable noise-level criteria at one residence near the project area."*	The "applicable" criteria is based on FRA guidelines. Consistent with comment regarding 3.1.1.1 of the Noise & Vibration TR, the FRA standard that is used is not applicable to construction noise from the terminal, it has been arbitrarily applied as there is not regulation in Washington. The analysis is interesting but inappropriate. Washington State maximum

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			permissible noise level regulations (WAC 173-60-040) do not apply to construction noise during daytime hours (between 7 a.m. and 10 p.m.).
Summary	Page S-35, Air Construction	Clarify language to show that computer modeling was not used to determine compliance with air quality standards. Maximum emissions were compared to operational emissions, and those were modeled (and shown to be compliant).	Statement is misleading, because there was no computer modeling performed for construction impacts.
Summary	Page S-35, Air Operations, third paragraph	Clarify meaning of *"The largest emissions for a single pollutant would be carbon monoxide (69%) and volatile organic compounds (VOCs)(63%)"*, or remove sentence.	This sentence does not make sense. What are these percentages of?
Summary	Page S-36, Coal Dust, first paragraph	Revise sentence to read: "*The movement of the train cars during transit <u>may</u> create vibrations that could break larger pieces of coal into smaller <u>pieces</u>*."	As originally written, this is an unsubstantiated claim and would need to be proven to be referred to here. To have it remain in the text is misleading.
Summary	Page S-35, Coal Dust first paragraph, last sentence.	Rewrite to be less definitive: "Coal dust ~~would~~ <u>may</u> also be generated and dispersed by wind~~s~~ ~~and air currents~~ during coal stockpiling …."	This is not necessarily fact, as controls, including natural controls (rain and coal moisture), would prevent this. No need to use "air current" in here as anything different from wind; the use of "air current" suggests coal dust moving long distances with large air masses, and could imply that a light current could move coal dust around, which is, in fact, highly unlikely.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
Summary	Page S-36, Coal Dust second paragraph	Add information about the site being part of the study area.	One or both of the study areas needs to include the site, not just the rail lines outside of the site.
Summary	Page S-36, Coal Dust third paragraph	Use correct terminology for PM2.5 and PM10: particulate matter with a mean diameter less than *or equal to* [2.5/10] *micrometers* in diameter.	Consistent with federal definitions. "Micron" is old terminology and no longer correct.
Summary	Page S-36, Coal Dust fourth paragraph	Remove references to "standard" when discussing nuisance. Clarify usage of New Zealand document and any reference concentrations/rates.	The assessment of nuisance is subjective. There are no standards, and referencing a threshold level from another country is inappropriate. In addition, the New Zealand document is a guide, not a standard. The New Zealand materials describe this as a "Good practice guide for assessing and managing the environmental effects of dust emissions" . Furthermore, page 32 of the New Zealand document states: "In some industrial or sparsely populated areas, deposition rates of more than 4 g/m2/30 days may not cause significant nuisance. However, in highly sensitive residential areas deposition rates in the order of 2 g/m2/30 days, above background concentration, may cause nuisance." It is misleading to have the NZ

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			document represented the way it is here (authors are citing the 2 g/m2/30 day trigger level throughout the report, when it is likely not even applicable to the project study area (industrial and rural).Also, there are British, Australian and IOS standards; provide justification for referring only to the New Zealand case.
Summary	Page S-36, Coal Dust, Operations, second paragraph	Remove discussion of "trigger level for sensitive area".	There is no substantiation in technical report regarding a 'trigger' level or any valid regulatory threshold, and there is no discussion defining 'sensitive' areas or receptors.
Summary	Page S-36, Coal Dust, Operations, second paragraph	Coal Dust: *"The study found the estimated maximum coal dust deposition from coal export terminal operations at and beyond the project area boundary would be 0.31 gram per square meter per month (near Mount Solo Road). This estimated maximum deposition would be below the trigger level for sensitive areas (2.0 grams per square meter per month) used for the analysis. Within a few thousand feet of the project area, the annual deposition of coal dust is estimated to be less than 0.1 gram per square meter per month."* Revise/clarify this conclusion statement. Simplify to discuss that analysis shows potential for coal	This is first mention of "the study" (clarify that this is an analysis of proposed project), and first mention of a specific "trigger level" (see comment above), which makes it seem like an absolute/definitive standard. Make whole statement qualitative and refer to New Zealand (or whichever is eventually used) nuisance guideline level.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		dust deposition, but do not quantify, as these results and potential impacts are misleading.	
Summary	Page S-37 Coal Dust, second sub bullet under each of the bulleted headings	Remove/rewrite 2nd sub-bullet in each case.	Do not use inapplicable 'threshold' terminology. References to nuisance should be qualified as subjective.
Summary	Page S-37, Coal Dust BNSF Main Line, Cowlitz County and BNSF< Mainline, Washington State, second sub-bullet under each of the headings	Provide explanation as to why the results change between the County and Washington State,	Provide brief/summary explanation (and details in Coal Dust section and Technical Report).
Summary	Page S-37, Coal Dust, Operations, first paragraph bellow the bulleted items, last sentence	Remove/rewrite sentence to exclude the 'threshold' terminology.	Threshold reference is not applicable; reference is to a foreign guideline for nuisance.
Summary	Page S-41 Cultural Resources	Language should be updated to reflect agreed to language in Section 106 MOA	Section 106 MOA is intended to mitigate for the loss of the Historic District
Summary	Page S-46, Section 3.4, Cultural Resources, MM CR-1	Language should be made consistent with language stated in Section 106 MOA Stipulation: *"Archaeological Monitoring. MBT-Longview does not anticipate excavating into potentially intact sediments, but if they do, the work will be conducted under a monitoring plan/inadvertent discovery plan (IDP) reviewed by the Consulting Parties and approved by the Corps and DAHP prior to ground-disturbing work in the Project*	Section 106 MOA will be the controlling measure

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		area. Prior to approval of the plan, MBT-Longview can coordinate with DAHP and the Corps to determine if proposed ground-disturbing work would require monitoring/IDP on a case-by-case basis (e.g., demolition of a building on 10+ feet of verified fill would not likely require archaeological monitoring).”	
Summary	Page S-46, Section 3.4Cultural Resources	Additional stipulations from agreed upon Section 106 MOA should be added	Text should be updated to reflect status as of time of FEIS
Summary	Page S-46, Section 3.5, Tribal Resources, MM FISH-3	We suggest that the proposed mitigation measure to monitor wildlife during dredging and pile driving be removed. *“MM FISH-3. Monitor Pile-Driving and Dredging Activities for Distress to Fish and Wildlife. See discussion in Section 4.7, Fish, in this table.”*	We disagree that monitoring for wildlife distress during maintenance dredging would be a necessary or effective mitigation measure. Impacts would be sufficiently minimized through timing restrictions of the work, construction BMPs, and noise mitigation measures, as required at other similar dredging projects along the Columbia.
Summary	Page S-51, Section 4.7, Fish, MM FISH-3	We suggest that the proposed mitigation measure to monitor wildlife during dredging and pile driving be removed. *“To minimize the potential harm to marine mammals, diving birds, or fish, a professional biologist will observe the waters near pile-driving and dredging activities for signs of distress from fish and wildlife during these activities.”*	We disagree that monitoring for wildlife distress during pile driving or dredging would be a necessary or effective mitigation measure. Impacts would be sufficiently minimized through timing restrictions of the work, construction BMPs, and noise mitigation measures. [ditto if true]

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Page S-52, Section 4.8, Wildlife, MM FISH-3	We suggest that the proposed mitigation measure to monitor wildlife during dredging and pile driving be removed. *"MM FISH-3. Monitor Pile-Driving and Dredging Activities for Distress to Fish and Wildlife. See discussion in Section 4.7, Fish, in this table."*	We disagree that monitoring for wildlife distress during pile driving or dredging would be a necessary or effective mitigation measure. Impacts would be sufficiently minimized through timing restrictions of the work, construction BMPs, and noise mitigation measures. [ditto if true]
Summary	Page S-54, Section 5.2, Rail Safety	*"Without improvements to rail infrastructure to improve rail safety, the Proposed Action could result in an unavoidable and significant adverse impact on rail safety."*	The suggestion that coal trains are causational is misleading, suggesting it has something to do with the coal being transported. If the statement about more accidents is true then it is about more trains, not coal trains.
Summary	Page S-54, Section 5.4, Vessel Transportation	*"If an incident such as a collision or allusion occurred, the Proposed Action could result in unavoidable and significant adverse impact on vessel transportation."*	The suggestion that coal ships are causational is misleading, ... If the statement about shipping being compromised is true, then it is about vessels using the river, not coal vessels.
Summary	Page S-57, Section 5.7, Coal Dust	CDUST-4: *"Provide Information to the Columbia River Gorge Commission. To address statewide public interests and concern of coal dust emissions, the Applicant will attend at least one Columbia River Gorge Commission public meeting per year and be available to present information on coal dust emissions and rail traffic related to the Proposed Action and discuss concerns."*	This requirement should be deleted. This is not an issue within the control of the Applicant. Trains and dust in the Gorge are not something the Applicant has information on or manages. This is information held by the railroad.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
Chapter 1 Introduction	No comments		
Chapter 2 Project Objectives, Proposed Action and Alternatives	Page 2-15, Water Systems, second paragraph, last sentence	Revise "*The proposed trestle and docks would have capture and containment measures ~~beneath them~~ and all water…"*	The capture and containment measures are not necessarily beneath the trestle and docks
Chapter 3 Built Environment: Existing Conditions, Project impacts, and Potential Mitigation Measures			
3.1 Land and Shoreline Use	Page 3.1-1, Table 3.1-1	Match Table 3.1-1 to the table in the "SEPA Land and Shoreline Use" Technical Report	Table in Section 3.1 is labeled the same as the table in the Technical Report, but does not match exactly.
3.1 Land and Shoreline Use	Page 3.1-1	Include the City of Longview Comprehensive Plan in Table 3.1-1	This would give a more thorough background and should be included.
3.1 Land and Shoreline Use	Page 3.1-4, Subsection 3.1.4.1	Move Section 3.1.4.1 into Section 3.1.1 Regulatory Setting.	The subsections in 3.1.4.1 discuss the regulations and ordinances for the project area. It is confusing that these paragraphs are contained within the "Existing Conditions" section as they are not describing the land itself but rather the regulatory limitations imposed on it.
3.1 Land and Shoreline Use	Page 3.1-10, Figure 3.1-4	Include a map (or possibly a call-out box on figure 3.1-4) that shows the two single-family residences that are within the 500-foot study area.	The map in Figure 3.1-4 does not show enough detail to highlight where these parcels are located.
3.1 Land and Shoreline Use	Page 3.1-14, Land Use and Shoreline Resources	Modify or clarify language contained in section titled *"Modify Existing Land and Shoreline Uses in the Project Area"*	The lines, *"the Proposed Action would not change the land use character of the project area substantially and […] the land use character of the project area*

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			would remain generally consistent with other land uses in the 500-foot study area," implies that there will be changes (though small), but doesn't give any detail about what those changes will be. Remove words "substantially" and "generally".
3.1 Land and Shoreline Use	Page 3.1-17, Section 3.1.5.2, Subsection "Construction— Direct Impacts"	Include definitive statement about impacts similar to other sections.	This section implies that there would be no impacts, but doesn't actually include a statement saying that. All other sections have a sentence that states directly whether or not there will be impacts (and whether they are temporary).
3.1 Land and Shoreline Use	Page 3.1-17, Section 3.1.5.2, Subsection "Construction— Indirect Impacts"	Include more details and explanation for the finding of no indirect construction impacts.	Refer to the August 2014 URS Resource Report for Land Use and Shoreline Plans and Policies, which states that there will be minor and temporary impacts anticipated adjacent to the property.
3.2 Social and Community Resources	Page 3.2-2	"Information Sources" should include a review of the Vulnerable Populations Emergency Plan for Cowlitz County.	This would add an additional level of depth to the chapter.
3.2 Social and Community Resources	Page 3.2-14	*"An existing sewage treatment system provides sewer service to the project area"*	Should be deleted. The project site will be connected to City sewer.
3.2 Social and Community Resources	Page 3.2-23, paragraph above	Clarify whether the $38,730 annual salary for transportation and material moving occupation in	The previous paragraph mentions that the assumed annual wage in

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	"Generate Tax Revenue"	Cowlitz County includes benefits.	the economic impact analysis was $130,000, including benefits. To make a complete comparison between this number and the lower annual salary for a line of work similar to work from the Proposed Action in Cowlitz County, the EIS should compare numbers that factor in the same things.
3.2 Social and Community Resources	Page 3.2-25, "Affect Accessibility to Community resources and Public Services"	Revise discussion on the impacts caused by train delays during peak traffic hours.	Avoiding significant traffic delays caused by two or more Proposed-Action trains coming through during peak traffic times relies on the assumption that improvements will be made by the owners of the Reynolds Lead and BNSF Spur, but mentions that no plans have been submitted or permitted.
3.3 Aesthetics, Light and Glare	No comments		
3.4 Cultural Resources	Cultural Resources	General Comment - Language should be updated to reflect agreed to language in Section 106 MOA	Section 106 MOA is intended to mitigate for the loss of the Historic District
3.4 Cultural Resources	Page 3.4-8, Ethnographic Context, third paragraph, last sentence	It is requested that the word *"entirely"* be deleted so sentence would read: *"….quarrying of Mount Coffin's volcanic rock gradually reduced the landform in size until it was ~~entirely~~ removed."*	Remnants could exist
3.4 Cultural Resources	Page 3.4-19, 3.4.7.1 Applicant	Language should be made consistent with language stated in Section 106 MOA Stipulation:	Section 106 MOA will be the controlling measure

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Mitigation, MMCR-1	*"Archaeological Monitoring. MBT-Longview does not anticipate excavating into potentially intact sediments, but if they do, the work will be conducted under a monitoring plan/inadvertent discovery plan (IDP) reviewed by the Consulting Parties and approved by the Corps and DAHP prior to ground-disturbing work in the Project area. Prior to approval of the plan, MBT-Longview can coordinate with DAHP and the Corps to determine if proposed ground-disturbing work would require monitoring/IDP on a case-by-case basis (e.g., demolition of a building on 10+ feet of verified fill would not likely require archaeological monitoring)."*	
3.4 Cultural Resources	Page 3.4-19, MMCR-1	Update language on Unavoidable and Significant Adverse Environmental Impact to reflect completion of Section 106 MOA and the mitigation agreed to for the loss of the Historic District; reducing impacts to less than significant	Text should be updated to reflect status as of time of FEIS
3.4 Cultural Resources	Page 3.4-19, 3.4.7.1 Applicant Mitigation	Additional stipulations from agreed upon Section 106 MOA should be added	Text should be updated to reflect status as of time of FEIS
3.4 Cultural Resources	Page 3.4-16, Section 3.4.8	Language should be updated to reflect agreed to language in Section 106 MOA (same comment as on page S-41 above)	Section 106 MOA is intended to mitigate for the loss of the Historic District
3.5 Tribal Resources	Page 3.5-1, and throughout	Most instances of the word "would" should be changed to "could"	There is not an absolute statement of cause to support the use of would. Eg "3.5.8 Activities related to the Proposed Action would cause physical or behavioral responses in fish"
3.5 Tribal Resources	Page 3.5-4, Figure	Verify the Figure 3.5-4 is accurate in showing the	Figure 3.5-4 shows the Zone 6

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	3.5-1	Zone 6 Treaty Commercial fishery extending below the Bonneville Dam. Edit if needed.	Treaty Commercial fishery extending below the Bonneville.
3.6 Hazardous Materials	Page 3.6-9, Cryolite Recovery Plant	Correct this language: *"the cryolite recovery plant also recovered reusable fluorides compounds call "underflow solids" which were eventually used to control air emissions that occurred during the aluminum manufacturing process"* The correct statement would be: *"the cryolite recovery plant also recovered reusable fluoride compounds called "underflow solids" which were generated from the air emission control systems that occurred during the aluminum manufacturing process."*	Statement is incorrect
3.6 Hazardous Materials	Page 3.6-11, 3.6.4.2 Remediation History	3.6.4.2 "In 2007, Northwest Alloys ~~and the Applicant~~ signed an agreed order with Ecology…" (delete reference to the Applicant)	MBT-Longview (Applicant) did not exist in 2007. Chinook Ventures signed the agreed order with NWA in 2007.
3.6 Hazardous Materials	Page 3.6-19, Caulking and Sealants, third paragraph	The section starting with " Project area preparations would involve preloading…" does not seem to fit in this section Caulking and Sealants.	
3.6 Hazardous Materials	Page 3.6-22, Operations – Direct Impacts, bulleted list	Delete from bullet references to sulfuric acid, calcium hydroxide, and lime	The water treatment ponds are used to settle out sediment. Flocculants would be used. There is a chance that the water distributi8on systems may need the addition of an antiscalant to manage the hardness in the process waters.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
2.6 Hazardous Materials	Page 3.6-22, Operations – Direct Impacts, bulleted list	Delete the bullet: "Chemicals used in the on-site laboratory…"	There is no on-site laboratory as part of the Proposed Action.
3.6 Hazardous Materials	Page 3.6-22, Operations – Direct Impacts, bulleted list	Delete reference to coal handled during operation as a hazardous material.	See substantive comments above in Comment Letter. Coal is not classified as a hazardous material under any definition.
Chapter 4 Natural Environment: Existing Conditions, Project impacts, and Potential Mitigation Measures			
4.1 Geology and Soils	Page 4.1-13, last paragraph	Revise: *"However, imported preload and rail ballast materials would be washed prior to delivery to the project area."*	There is no requirement nor intention on the part of the Applicant to wash ballast and preload materials before delivery.
4.1 Geology and Soils	Page 4.1-15, Ground Shaking	Suggest that the second sentence be changed to read: "*…between 0.4 to 0.5 g, which has a 2% chance of being exceeded in 50 years"*	Current text is missing the time period in reference to the per cent risk
4.2 Surface Water and Floodplains	Page 4.2-4 & 5, Figures 4.2-1 and 4.2-2	"*……. Downstream 1 mile from the project area"*	Figure 4.2.1 and 4.2.2 show the indirect study area extending 2 miles downstream of the project area, not 1 mile as in the text.
4.2 Surface Water and Floodplains	Page 4.2-14, Section 4.2.5.1, second bullet	*"Based on site grading and drainage areas, five water quality ponds (Wetponds) will treat runoff based on Ecology's requirements"*	This needs to be checked against the Water Management Plan. There are not five ponds planned.
4.2 Surface Water and Floodplains	Page 4.2-15, top of the page	*"some surface ponding will occur in both the yard areas and open conveyance systems."*	The open conveyors are designed to drain water not hold water.
4.2 Surface Water and Floodplains	Page 4.2-15, top of the page	*"The piped conveyance systems will be sloped at a 0.50% minimum."*	The proposed conveyance system is not considered a "piped conveyance system."
4.2 Surface Water and Floodplains	Page 4.2-17, Operations – Direct Impacts, Alter	This statement is incorrect *"The Proposed Action would include modifications to the existing stormwater management system to address the*	The statement as written is incorrect.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Water Collection and Discharge, first paragraph, last sentence	*anticipated need."* We suggest that this be rewritten: *"The Proposed Action would develop a water management system, including capture of stormwater from the project area, separate from the existing stormwater management system and isolated from it."*	
4.2 Surface Water and Floodplains	Page 4.2-17, Operations – Direct Impacts, Alter Water Collection and Discharge, second paragraph, first sentence	*"The proposed modifications to the water management system would……"* Change this to read "The Project Water Management System would ….."	A new Water Management System would be developed for the project.
4.3 Wetlands	Page4.3-3, Section 4.3.3.1: Information Sources	Second sub-bullet should read: "*Bulk Product Terminal Wetland and Stormwater Ditch <u>Reconnaissance</u> ~~Delineation~~Report–Parcel 10213* (Grette Associates 2014b)".	Bulk Terminal Wetland Report for Parcel 10213 is misidentified.
4.3 Wetlands	Page 4.3-6, Figure 4.3-1 Wetlands in the Study Area	Revise figure to indicate surface water feature along bank of Columbia River in southeast portion of site as "unsurveyed".	The feature in the lower right corner of the figure categorized as Surface/Stormwater Features, was characterized as "unsurveyed" in the Grette report.
4.3 Wetlands	Page 4.3-9, Figure 4.3-4 Wetlands in the Study Area – South	Revise figure to indicate surface water feature along bank of Columbia River in southeast portion of site as "unsurveyed".	The feature in the lower right corner of the figure categorized as Surface/Stormwater Features, was characterized as "unsurveyed" in the Grette report.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
4.3 Wetlands	Page 4.3-10, Table 4.3-2: Wetlands Identified in the Study Area	Revise table. AS1 size should be 8.86 acres, instead of 8.72 acres. Wetland total should be revised to 87.09 acres, instead of 86.95 acres.	Wetland AS1 is reported to be 8.72 acres in size. According to *Bulk Product Terminal Wetland and Stormwater Ditch Reconnaissance Report–Parcel 10213* (Grette Associates 2014b), Wetland AS1 is 8.86 acres in size.
4.3 Wetlands	Page 4.3-11, Section 4.3.4.2 - Scrub-Shrub Wetlands	Area of forested wetlands may be incorrectly calculated.	To calculate the area of forested wetland in Section 4.3.4.1, ICF divided the acreages of wetlands C and NW4 in half, presumably since the wetlands are listed as PEM/PFO and PSS/PFO, respectively. Here, it appears they used a different breakdown. Using the above logic, the total would be 7.46 acres of PSS wetland as opposed to the 5.10 acres reported in the DEIS. Grette Associates did not report a breakdown of wetland classes by acreage. The EIS text needs to identify methods used and remain consistent with the source documents.
4.3 Wetlands	Page 4.3-11, Section 4.3.4.3: Emergent (Herbaceous) Wetlands	Acreage for Emergent Wetland may be incorrectly calculated.	Same comment as above. Unclear how the EIS authors came up with this acreage for Emergent Wetland (73.67 acres) considering several wetlands have more than one Cowardin class. This total

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			also includes the incorrect wetland acreage in Comment above regarding Table 4.3-2.
4.3 Wetlands	Page 4.3-16, Section 4.3.5.1 – Proposed Action, Construction - Indirect Impacts	Coal dust settling on vegetation is identified as an indirect impact in the construction section.	This topic should be addressed in operations rather than construction.
4.3 Wetlands	Page 4.3-18, Section 4.3.7.1 - Applicant Mitigation	*"Any applicant-sponsored mitigation will be consistent with mitigation ratios as stipulated local, state and federal guidance and regulations."*	It is unclear why the DEIS states that the highest wetland mitigation ratio must be used. The process for developing ratios for wetland mitigation is contained in *Wetland Mitigation in Washington State* (Washington State Department of Ecology, U.S. Army Corps of Engineers Seattle District, and U.S. Environmental Protection Agency Region 10, 2006). This guidance, along with the requirements of the appropriate local, state and federal agencies, are used to develop mitigation ratios for impacts to wetlands. In the subsequent paragraph, the DEIS explains that the mitigation ratios will be developed "consistent with current local, state and federal guidance and regulations". The preceding

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			paragraph should be revised to be consistent with this statement.
4.4 Groundwater	Page 4.4-16, three lines above heading for Construction – Direct Impacts	*"Operational activities that could impact groundwater ~~geology and soils~~ include the following."*	Incorrect reference to geology and soils; should be reference to groundwater
4.5 Water Quality	Global comment on number of piles	*"Removing ~~4,312~~* **4,263** *square feet of river bottom for ~~630~~* **603** *piles used for the proposed docks* **below OHW**."	This is a global edit regarding an incorrectly stated number of piles and associated pile footprint. The current pile numbers are 622 total, 603 of which would be below OHW. This results in removal of 4,263 sq ft of river bottom (Grette Associates, LLC. 2014; Table 1, p. 17).
4.5 Water Quality	Page 4.5-1, end of first sentence	Period missing "…..recreational activities The quality of……."	typo
4.5 Water Quality	Page 4.5-3, Local Regulations, Statutes, and Guidelines for Water Quality, Table 4.5-1	Missing City of Longview Stormwater Ordinance that is presented in the Technical Report	Establishes methods for controlling the introduction of runoff and pollutants into the municipal storm drain system (MS4) in order to comply with requirements of the Western Washington Phase II Municipal Stormwater NPDES Construction Stormwater General Permit process.
4.5 Water Quality	Page 4.5-14, bulleted list, 5th primary bullet	Starting with the fifth first-level bullet on the page *("Stormwater, sediment and erosion control…),* the list of commitments is not consistent with and significantly more extensive	Need to confirm the list of commitments are consistent with expectations and previous discussions and/or agreements

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		than the list provided in Section 3.1 Impacts of the SEPA Water Quality Technical Report	
4.5 Water Quality	Page 4.5-16, first primary bullet	Add the word pile before extraction *"Where possible, pile extraction equipment…"*	Clarify that it is pile extraction equipment
4.5 Water Quality	Page 4.5-17, fifth primary bullet	5th Bullet: *"Project construction would limit the impact of turbidity"* – clarify if this reference is to pile removal or construction in general Delete 8th bullet: "Project construction would limit the impact of turbidity"	Sentence is repeated as both 5th and 8th bullet
4.5 Water Quality	Page 4.5-18, top of page	The last two bullets under section 4.5.5.1 Proposed Action, have been added to the DEIS text and are not present in the Water Quality Technical Report in the list of potential impacts resulting from the Proposed Action: • *"Operations of 16 trains a day* • *Operations of 70 ships a month"*	Text between the two documents should be made consistent
4.5 Water Quality	Page 4.5–21, Section 4.5.5.1 – Proposed Action, Temporarily Mobilize Pollutants or Increase Turbidity from In-Water Work and Dredging	*"A total of ~~610~~* **603** *of the ~~630~~* **622** *36-inch diameter steel piles required for the trestle and docks would be placed below the ordinary high water mark, permanently removing an area equivalent to 0.10 acre (~~4,312~~* **4,263** *square feet) of river bottom."*	Global pile number and footprint edit (Grette Associates, LLC. 2014; Table 1, p. 17).
4.5 Water Quality	Page 4.5–21, second to last paragraph	The second to last paragraph states that the process of removing the creosote-treated piles could result in the release of chemical contamination and sediment into the surface water. The document does not discuss the potential option of cutting off the piling at the	Suggest that this potential mitigation measure be considered if not discussed earlier and is feasible

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		mud line instead of removal, and whether that option is feasible.	
4.5 Water Quality	Page 4.5-23, Operations – Direct Impacts, Introduce Contaminants from Coal Spills and Coal Dust, first sentence	*"would be 16 trains a day under the Proposed Action. An average of 70 ships a month"* Text should be revised to *"would be 8 trains a day under the Proposed Action. An average of 70 ships a month.*	References are inconsistent. If this discussion is intended to refer to the trains and vessels that are carrying coal, then it would seem it would be 8 trains per day and 70 ships per month. The other 8 trains would be empty and not carrying coal.
4.5 Water Quality	Page 4.5-24, top of page, first paragraph	*"…….would be collected within the stockpile pads (which are impervious), conveyed within an enclosed."*	The reference to impervious is incorrect, elsewhere it is referred to as low permeability, see page 3.6-23 2nd paragraph as an example
4.5 Water Quality	Page 4.5-24, first paragraph, eight lines from the bottom	"surge bin~~d~~s" (delete the d)	typo
4.5 Water Quality	Page 4.5-25, last paragraph	*"The deposition of coal dust could be as high as 1.88 grams per square meter adjacent to the project area."*	Is this an annual deposition?
4.5 Water Quality	Page 4.5-28, Propeller wash	*"….Tankers and cargo vessels…."* – delete reference to tankers	No tankers are included in the Proposed Project
4.5 Water Quality	Page 4.5-31, MM WQ-1	*"MM WQ-1. Locate Spill Response Kits Near Main Construction and Operations Areas"* is included under BMP C154. It is not clear why MM WQ-1 is presented as a separate mitigation measure	Should consider deleting this mitigation measure unless there is a benefit in having it retained in the document
4.6 Vegetation	Page 4.6-17, Rail car unloaders	*"Rail car unloaders will be:* □ *fog and water spray systems."*	Revise – these methods are used for dust control, not cleaning

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
4.6 Vegetation	Page 4.6-17, Permanently Remove Vegetation, first sentence	Text should be revised: *"… permanently remove ~~189~~ 26 acres of nonwetland"*	The project area is only 190 acres. This should be 26 acres – see DEIS page 4.6-18, Table 4.6-6
4.6 Vegetation	Page 4.6-18, Table 4.6-6	Impacts to Upland Forested Habitat reported to be: *8.84 acres* Impacts to Upland Scrub-Shrub Habitat reported to be: *2.10 acres* Please review these calculations as they appear to include acres of wetlands, whereas Table 4.6-6 seems to indicate that wetlands are excluded from the total.	Total acres of impact to forested upland habitat are more than double Grette Associates' total. The cause of this discrepancy is unclear; however, it appears that the DEIS author may be reporting total forested habitat, including wetland acreage. In that case, the total would be close to Grette Associates' total. However, Table 4.6-6 seems to indicate that impacts to wetlands are not included in the total.
4.6 Vegetation	Page 4.6-20	"and ~~maintenance~~ control of vegetation under the conveyor"	Vegetation will not be maintained under the conveyor
4.6 Vegetation	Page 4.6-21, Alter Vegetation during Maintenance Activities,, first paragraph	*"Trees and tall shrubs around the conveyor to the shiploaders on Docks 2 and 3 would likely be regularly trimmed or removed, slightly reducing organic material delivered to the river, shade the upper beach and shoreline, and native foraging, resting, and perching opportunities to for passerine birds. The 45- to 50-foot-wide area that would be affected is small relative to the approximately 5,000 linear feet of vegetated shoreline in the project area."*	This should be deleted. There are no trees or tall shrubs currently nor planned for the location around the conveyor.
4.6 Vegetation	Page 4.6-21, Deposit Coal Dust	Why is coal dust singled out?	The discussion of coal dust on vegetation could apply to all

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	on Vegetation		forms of dust, why is coal singled out? There should be a mention of rail washing the leaves clean or any coal dust for the majority of the year, which will reduce impacts.
4.6 Vegetation	Page 4.6-24, Spill Coal during Rail Transport, last two lines	*"In Cowlitz County, the predicted number of loaded coal train incidents is approximately one every 2 years. The predicted number of loaded coal train incidents within Washington State is approximately five"*	Why is coal separated out from other commodities? What makes a coal train more likely to have an incident than another train?
4.7 Fish	Global comment on number of piles	*"Removing ~~4,312~~* **4,263** *square feet of habitat from the river bottom of the Columbia River to install ~~630~~* **603** *piles for the new docks."*	Global pile number and footprint edit (Grette Associates, LLC. 2014; Table 1, p. 17).
4.7 Fish	Page 4.7-3, Figure 4.7-1: Fish direct study area	Revise the figure to show the upstream portion of the project area to RM 67.	The upstream project area should go to RM 67, which is correctly described in the text of the SEPA fish report.
4.7 Fish	Page 4.7-5, Section 4.7.3.1 – Information Sources	Add the following document to the list: Grette Associates, LLC. 2014. *Millennium Coal Export Terminal Longview, Washington: Docks 2 and 3 and Associated Trestle: Indirect Effects of Structures and Site Operations*. September 2014. Wenatchee, WA. Prepared for Millennium Bulk Terminals—Longview, LLC, Longview, WA.	This document was not included.
4.7 Fish	Page 4.7-6, Section 4.7.3.2 – Impact Analysis, Assessing Noise Impacts	Strike paragraph 1, sentence 2.	It is not correct to indicate a range with different reference values (150 dB_{RMS} to 206 dB_{peak}, inclusive of 183/187 dB_{SELcum}). The table is correct for

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			thresholds.:
4.7 Fish	Page 4.7-8, Table 4.7-3	Suggest revising the definition for TSS to: Temporary loss of hearing sensitivity (Popper et al. 2014) Citation for inclusion: Popper, A.N., Hawkins, A.D., Fay, R.R., Mann, D., Bartol, S., Carlson, T., Coombs, S., Ellison, W.T., Gentry, R., Halvorsen, M.B., Løkkeborg, S., Rogers, P., Southall, B.L., Zeddies, D., Tavolga, W.N. (2014) Sound Exposure Guidelines for Fishes and Sea Turtles: A Technical Report prepared by ANSI-Accredited Standards Committee S3/SC1 and registered with ANSI. ASA S3/SC1.4 TR-2014. Springer and ASA Press, Cham, Switzerland.	The definition for TTS should be changed to something that does not indicate injury (temporary or otherwise). (e.g., Popper et al. 2014). Note: Popper et al. 2014 not cited in the DEIS or included in the references section.
4.7 Fish	Page 4.7-8, Section 4.7.4 – Existing Conditions	For consistency, please revise this section to adopt the definition for the Columbia River estuary as described below. Language from the Grette 2014a below for reference: Bottom et al. (2005) describe the entire lower Columbia River from its mouth to the base of Bonneville Dam (RM 146) as the Columbia River estuary, further defining four estuarine gradients within it. The tidal freshwater or fluvial region of the estuary extends from Bonneville Dam down to approximately RM 34 (RKm 55). Farther downstream are the brackish-mesohaline region between approximately RM 19 and 34 (RKm 30 and 55), the euryhaline region between approximately the mouth of the Columbia River	The last paragraph in this section describes the Columbia River estuary as being downstream of the project area. The supporting documents (e.g., Grette 2014a) use the definition of estuary (Bonneville Dam to mouth of the Columbia River) with four estuarine gradients adopted from Bottom et al. 2005.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		and RM 19 (RKm 30), and the Columbia River plume which extends into the surface water beyond the mouth of the Columbia River. The Project area is located the tidal freshwater region.	
4.7 Fish	Page 4.7-9, Figure 4.7-3 and Page 4.7-10, Section 4.7.4.1 – Aquatic Habitat Types	Suggest revising the document to express depths relative to CRD datum for consistency.	This is the first example of a global comment regarding depths for habitat zones. The supporting/source documents (Grette 2014a - f) use the CRD datum for all depths (e.g., -20 ft CRD). The narrative in the DEIS uses an absolute depth (e.g., 31 feet deep). While it appears this is depth relative to OHW, it is confusing. Further, water levels in this area are highly variable due to season and daily factors (e.g., tides).
4.7 Fish	Page 4.7-10, Section 4.7.4.1 – Aquatic Habitat Types, Active Channel Margin	Revise the second sentence as follows: *"The ACM near the proposed docks covers approximately 25 acres and extends from 25 to 350 feet offshore with a maximum depth of about 11 feet* **below OHW**.*"*	The upper limit of ACM habitat is defined by the Ordinary High Water (OHW) mark, which is defined as +11.1 ft CRD. It is somewhat misleading and confusing to define the SCM by "depth", as this is highly variable and relative to water levels. Tying this depth to the CRD datum—either the OHW elevation or 0 ft CRD—would be clarifying.
4.7 Fish	Page 4.7-11, Section	Revise the narrative and Table 4.7-4 to be	Table 4.7-4 is confusing because

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	4.7.4.2 – Focus Fish Species, Salmon and Trout and Page 4.7-12, Figure 4.7-4	consistent with the impact discussion in the SEPA Fish Technical Report. Table 7 and narrative used for the impact discussion (Section 3.1.1.1) in the SEPA Fish Technical Report is much more consistent with the information in the source documents.	it combines adults, juvenile fish, yearlings, and subyearlings (see Table 7 for comparison) but distinguishes among the habitat type (ACM, SMZ, DMZ). Also, it is not consistent with the information from the source document (assumed to be Grette 2014b). For example, coho could be present in the DWZ in the winter and summer. Finally, for many fish ESUs, this table appears to add habitat use in the SMZ which was not included in the summary tables in the source documents. This is not necessarily supported in narrative citations. Roegner and Sobocinski 2008, which is cited on page 4.7-11, did not demonstrate abundant steelhead in beach seine or purse seine data (see slide 7 in Roegner and Sobocinski 2008).
4.7 Fish	Page 4.7-15, Section 4.7.4.2 – Focus Fish Species, Bull Trout	Suggest revising to focus on infrequent use in DMZ by bull trout.	Narrative indicates that, in addition to the potential DMZ use (infrequent, very low numbers) by adult bull trout, that the ACM and SWZ could be used as shallow water rearing areas by subadult bull trout. Unlike

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			subyearling and yearling salmonids, which are smaller and likely to rely on shallow waters, bull trout (infrequently present) in the Columbia River are not likely to be present in these areas. While it is possible, based on the general lack of bull trout observed in beach and purse seine data, it is probably not appropriate to characterize them as regularly using or likely to use these areas.
4.7 Fish	Page 4.7-15, Section 4.7.4.2 – Focus Fish Species, Eulachon	*"WDFW and ODFW conducted plankton tows to sample for eulachon eggs and larvae in the water column at an index site at about RM 34 (Report A in Mallette 2014).* ~~*Recent studies have documented egg and larvael stage eulachon between the Port of Longview above Barlow Point and the channel below the Cowlitz River mouth, including four sample sites offshore of the Project Area (Mallette 2014).*~~ *Peak larval abundance occurred in mid-March during two of the three survey years and from late April to early May in the third year.* *As part of a related one-time sampling effort, eulachon eggs/larvae were documented in plankton tows at six sample sites (inshore and offshore) near the proposed Project between RM 62.8 to 64.0 in February 2012 (Report B in Mallette 2014)."*	Paragraph 2, sentence 1 acknowledges documented egg and larvae eulachon presence near the proposed project (see Table 1 in Report B of Mallette 2014). Plankton tow samples documented presence of eulachon "egg/larvae = yes" in all plankton tows, which were taken on a single day (2/10/12). The next sentence, relates to data from Report A of Mallette 2014, which is for peak larval abundance over three survey years at a WDFW index site further downstream, and is a broader measure of larval downstream transport timing for

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			the lower Columbia River and many tributaries.
4.7 Fish	Page 4.7-18, Section 4.7.4.2 – Focus Fish, Water Quality Conditions	*"Turbidity in the study area is variable based on a number of factors. For example, over five days of water quality monitoring for dredging, background levels (upstream from active dredging) ranged ~~consistently ranges~~ from ~~29 to 67~~ the mid-20s to the mid-60s nephelometric turbidity units (NTUs) at all depths (US Army corps of Engineers Dredged Material Management Office 2010 in Grette 2014c)."*	Sentence 6, re. turbidity levels. These turbidity levels appear to be based on the background levels observed during water quality monitoring in December 2011 and January 2012 during dredging. Although these levels are representative of the background levels observed, they are from a brief period during a single season.
4.7 Fish	Page 4.7-22, Section 4.7.5.1 – Proposed Action, Temporarily Alter and Permanently Remove Aquatic Habitat	*"A total of ~~610~~* **603***, 36-inch-diameter steel piles would be placed in-water, permanently removing 0.10 acre (~~4,312~~* **4,263** *square feet) of benthic habitat."*	Global pile number and footprint edit (Grette Associates, LLC. 2014; Table 1, p. 17).
4.7 Fish	Page 4.7-23, Section 4.7.5.1 – Proposed Action, Cause Physical or Behavioral Responses from Elevated Turbidity during Pile Driving and Dredge Disposal	Paragraph 1 – strike sentence 2 (not part of this section).	The temporal discussion of deepening the project area is addressed in the previous section and does not belong in the Section pertaining to turbidity.
4.7 Fish	Page 4.7-23, Section 4.7.5.1 – Proposed	*"Installation of ~~610~~* **603** *structural steel piles to support* **the trestle and** *Docks 2 and 3 would*	Global pile number and footprint edit (Grette Associates, LLC. 2014;

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Action, Cause Physical or Behavioral Responses to Underwater Noise during Pile Driving	*generate underwater noise during pile-driving (Grette Associates 2014b)."*	Table 1, p. 17). This pile number is reflective of the entire structure (e.g. trestle, Dock 2, and Dock 3) rather than only Docks 2 and 3.
4.7 Fish	Page 4.7-25, Table 4.7-7	Suggest replacing Table 4.7-7 with Table 7 from the SEPA Fish Technical Report. Also, suggest removing eulachon from the table and addressing them in the narrative.	Table 4.7-7 is confusing because it re-organizes the information layout, combines factors (e.g., shallow water subyearling vs. subyearling, shallow water), and does not correspond to Table 7 which is used for the detailed impact discussion in the SEPA Fish Technical Report.
4.7 Fish	Page 4.7-29, Section 4.7.5.1 – Proposed Action, Operations – Direct Impacts, Cause Physical or Behavioral Response to Vessel Noise	*"Source sound levels of bulk carrier vessels were measured in Puget Sound at between 187.9 and 198.2 dB re 1uPA at 1 meter when vessels were travelling between 9.0 and 11.0 knots (Hemmera Environchem et al. 2014)"*	Page 3-12 Cites bulk carrier vessel source sounds in Puget Sound. These values have little meaning if not referenced to dB_{peak} or dB_{RMS}. Without that context they cannot reasonably be compared to the behavioral threshold (150 dB_{RMS}).
4.7 Fish	Page 4.7-34, Section 4.7.5.1 – Proposed Action, Operations – Indirect Impacts, Spill Coal Dust During Rail Transport	*"In summary, <u>spilled coal</u> fugitive coal dust from project operations is not expected to increase…"*	Paragraph 1 (last in this section) is summarizing the discussion about spilled coal, not fugitive coal dust.
4.7 Fish	Page 4.7-34, Section	*"<u>If</u> ~~A~~<u>a</u>dult fish targeted in commercial and*	Paragraph 1 posits that increased

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	4.7.5.1 – Proposed Action, Operations – Indirect Impacts, Affect Commercial and Recreational Fishing	*recreational fishing were to alter behavior in response to ~~would likely migrate outside of the navigation channel to avoid~~ increased underwater noise ~~levels~~, they could avoid the navigation lanes or migrate quickly through them. Commercial and recreational fishing vessels would not likely be fishing in the navigation channel when large vessels are present. Therefore, the Proposed Action would be unlikely to significantly reduce commercial or recreational fishing catches or limit access for fishing activities."*	vessel traffic could cause behavioral responses in fish (presumably from disturbance associated with increased noise and vessel movement), and that adult fish would likely migrate outside of the navigation channel to avoid increased noise. This is too strong of a statement which is not supported by our understanding of fish behavioral responses to increased underwater sound or the actual levels and extents of underwater sound associated with vessel traffic. It is possible that such a response could happen in some cases. In either case, the conclusion of unlikely to significantly reduce commercial or recreational fishing catches is correct, but the distinction regarding certainty of effect is important.
4.8 Wildlife	Page 4.8-6, Section 4.8.3.3 – Impact Analysis, Assessing Noise Impacts	Suggest using the 0.5 mile buffer around the project site for this analysis.	Overall, this section would benefit from clarity regarding area considered – for noise impacts it seems it should be the 0.5 mile "buffer" around the project site.
4.8 Wildlife	Page 4.8-8, Section	*"Undeveloped areas are relatively small and*	While these patches of habitat

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	4.8.4.1 – Terrestrial Habitat	*fragmented. Patches of potentially suitable habitat could support foraging and cover for small to large mammals, foraging and nesting for a variety of birds, and foraging, breeding, and nesting for amphibians.* **However, as these constitute a small percentage of the site, their habitat value is very limited.***"*	could potentially support the species described, their small cumulative acreage, combined with their fragmented distribution, severely limit their habitat value. Please add the sentence noted.
4.8 Wildlife	Page 4.8-16, Section 4.8.5.1 – Proposed Action	Suggest removing the summary list entirely and relying instead on narrative and conclusions in full context.	Including vessel strikes and underwater vessel noise impacts on marine mammals (and diving birds for noise) in the summary list overstates the conclusions, which are low risk and minimal response, respectively.
4.8 Wildlife	Pages 4.8-18, Section 4.8.5.1 – Proposed Action, Construction – Direct Impacts, Cause Temporary Displacement or Mortality	The section on the displacement/mortality should be reconsidered.	This appears to address the area which will be permanently removed. There are no temporary impacts – once it's been removed the displacement is permanent.
4.8 Wildlife	Page 4.8-19, Section 4.8.5.1 – Proposed Action, Temporarily Alter or Permanently Remove Aquatic Habitat	*"Construction of the Proposed Action would result in the alteration or permanent loss of approximately 59 acres of aquatic habitat in the aquatic study area. Dredging to provide vessel access to Docks 2 and 3 would* **temporarily** *alter approximately 48 acres of benthic deepwater habitat and construction would result in the permanent loss of approximately 11 acres of aquatic habitat (ditches and ponds) throughout*	While it is technically true that 59 acres aquatic habitat would be altered or permanently lost, through its lack of precision this statement obscures the short-term nature of the impacts.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		the terrestrial habitats of the project area."	
4.8 Wildlife	Page 4.8-19, Section 4.8.5.1 – Proposed Action, Temporarily Alter or Permanently Remove Aquatic Habitat	*"The placement of ~~610~~* **603** *piles would permanently alter or remove benthic habitat in the Columbia River. Piles would displace approximately 0.10 acre (~~4,312~~* **4,263** *square feet) of river bottom habitat (7.07 square feet per pile multiplied by ~~610~~* **603** *piles)…"*	Global pile number and footprint edit (Grette Associates, LLC. 2014; Table 1, p. 17).
4.8 Wildlife	Page 4.8-19, Section 4.8.5.1 – Proposed Action, Temporarily Alter or Permanently Remove Aquatic Habitat	*"Construction of these docks would create ~~4.62~~* **5.13** *acres of new overwater surface area…"*	Docks 2 and 3 would cover 4.62 acres, but with the trestle the proposed structure would cover approximately 5.13 acres (Grette Associates, LLC. 2014; Table 1, p. 17).
4.9 Energy and Natural Resources	Page 4.9-1, Section 4.9.1	Include a discussion of building permits, Washington State Energy Code, and the county fire code.	This would add depth to the section.
Chapter 5 Operations: Existing Conditions, Project impacts, and Potential Mitigation Measures			
5.1 Rail Transportation	Page 5.1-4, last paragraph	*"The Applicant assumes a 10% increase in throughput (4 million metric tons of coal per year) from rail car capacity that can be achieved through industry process and technological improvements by 2028."* This is what the applicant actually stated …. The Applicant assumes a 10% increase in throughput (4 million metric tons of coal per year) is possible with rail car capacity increases, through process efficiencies and technological improvements by 2028"	Incorrect as written
5.1 Rail Transportation	Page 5.1-6, Future	*"Rail traffic estimates provided in the Washington*	We take issue with the addition of

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Rail Traffic, first line	*State Rail Plan do not include the rail traffic for proposed coal or crude oil projects in Washington State. Therefore, Proposed Action-related rail traffic was added to 2028 baseline rail traffic estimates for the purposes of this analysis."*	all Project related trains to the numbers included in the Rail Plan. The Rail Plan contains estimates for the next 19 years, we would think it reasonable that some or all of the additional Project-related 8 trains per day be included in that estimate. Otherwise, this could be double counting of new trains. Note 3 at the bottom of the page says it all: "The rail traffic estimates in the Washington State Rail Plan are based on data collected between 2010 and 2013. Rail traffic is highly dynamic and fluctuates as a result of changing demand. The 2028 rail traffic estimates are intended to provide a "snapshot" of estimated rail traffic volumes; the rail traffic estimates do not represent actual volumes for 2028."
5.1 Rail Transportation	Page 5.1-15, Add Temporary Rail Traffic for Transport of Construction Materials, first line	*"The Applicant proposes that approximately 2.1 million yards of ~~rock~~ suitable material would be needed for Construction"*	Replace "rock" with "suitable material" – fill materials may be other than rock
5.1 Rail Transportation	Page 5.1-17, Add Rail Traffic on the BNSF Main Line in	*"This segment has two main tracks with CTC. Projected 2028 capacity without improvements or operating changes is approximately 80 trains per*	This is an odd conclusion, 81 trains vs approximately 80 trains for a 12 year out estimate is well

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Cowlitz County, second paragraph,	*day. Projected 2028 volume with Proposed Action-related BNSF trains to and from the Powder River Basin is 81 trains per day; therefore, the projected volume on this segment with Proposed Action-related trains would exceed capacity (80 trains per day).”*	within the accuracy of the estimates
5.1 Rail Transportation	Page 5.1-24, Section 5.1.8 Unavoidable and Significant Adverse Environmental Impacts, last line	*“the Proposed Action could result in a significant adverse environmental impact on rail transportation.”*	This conclusion is unsupported in the preceding section; there is no discussion of how a rail capacity issue results in a significant environmental impact.
5.2 Rail Safety	Page 5.2-2	5.2.3.1 Information sources. In this section an accident is defined by things adding up to $10,500. In the 1st Paragraph of Section 5.2 it is stated “Rail safety for this analysis refers to train derailments and collisions that could lead to a loss of cargo”.	There is an inconsistency in these two statements. Which one is it?
5.2 Rail Safety	Page 5.2-7, Increase the Potential for Train Accidents, first bullet	*“With track improvements to the Reynolds Lead and BNSF Spur (Track Class 2): The predicted number of accidents is 0.25 per year for loaded Proposed Action-related trains, and 0.25 accident per year for empty Proposed Action-related trains. Therefore, 1.0 accident for each type of train (loaded and empty) every 4 years is predicted. Proposed Action– related traffic would increase the predicted accident frequency on the Reynolds Lead and BNSF Spur from 0.11 accidents per year to 0.61 accidents per year for all rail traffic.”*	These statements are inconsistent. Correct the language.
5.2 Rail Safety	Page 5.2-9,	*“Adding the train accidents from the inbound and*	Please clarify or explain why an

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Statewide Impacts, second paragraph	*outbound trains related to the Proposed Action to the total accident baseline would increase accidents from 50.43 accidents per year to 61.81 accidents per year. This means that within Washington State, the predicted increase in rail traffic accidents related to the Proposed Action is approximately 11.38 accidents per year (an increase of approximately 22% over the baseline)."*	increase of 8 trains or 10% of capacity would cause a 22% increase in accidents.
5.2 Rail Safety	Page 5.2-10, Section 5.2.8 Unavoidable and Significant Adverse Environmental Impacts	Delete the word "in": *"potential train accidents along ~~in~~ the rail routes in Cowlitz County"*	typo
5.3 Vehicle Transportation	Page 5.3-8, Vehicles, last sentence of first paragraph	*"This factor was used to ~~covert~~ convert count data from peak hour."*	typo
5.3 Vehicle Transportation	Page 5.3-11, Railroad Crossing Performance Measures, last bullet	Under vehicle safety impact, there is a 0.04 rate shown in the third bullet	What is the unit for the 0.04, accidents per year?
5.3 Vehicle Transportation	Page 5.3-12, Level of Service, third paragraph below Figure 5.3-3	The third paragraph under Figure 5.3-3. It indicates that the 2000 HCM is being used to calculate a signalized PM peak hour level of service for each affected rail crossing.	This methodology will calculate an average delay for not only automobiles at the crossing, but for the trains also. Since the trains go through the crossings without any delay, was the calculated train delay deleted

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			from methodology at some point?
5.3 Vehicle Transportation	Page 5.3-12, Level of Service, fourth paragraph below Figure 5.3-3	The fourth paragraph under Figure 5.3-3indicates that the 2000 HCM is being used to calculate a signalized daily level of service for each affected rail crossing.	Since the trains go through the crossing without delay, was the calculated train delay deleted from methodology at some point? Since the HCM methodology is based on calculation of an hourly level of service, how was this rectified to get to a daily average delay estimate?
5.3 Vehicle Transportation	Page 5.3-14, second paragraph	2nd paragraph again has a 0.04 rate	What are the units for this rate (again accidents per year)?
5.3 Vehicle Transportation	Page 5.3-24, Average Vehicle Delay	Under Average Vehicle Delay, the text indicates that all study area crossings operate at LOS A in 2018	This does not appear to be the case in Table 5.3-5. Please clarify as to which is correct.
5.3 Vehicle Transportation	Page 5.3-24, Table 5.3-5	Table 5.3-5 level of service	Some of the levels of service in Table 5.3-5 don't appear to match what is in the attached Synchro worksheets. Is this because the calculated rail delay was removed from the level of service calculation? The analysis worksheets should be checked against the referenced tables.
5.4 Vessel Transportation	Page 5.4-5, fourth primary bullet	*"Increased risks of bunker oil spills were addressed."*	Why mention bunkering risk when it is not part of our proposed action?
5.4 Vessel Transportation	Page 5.4-35, Operation – Direct Impacts, second paragraph	*"Vessel loading would be performed using an electric-powered, single-traveling shiploader installed on Docks 2 and 3."* Should state: " Vessel loading would be performed using an	Each dock will have one shiploader. Text as written could be misinterpreted as having one traveling shiploader total.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		electric-powered shiploader. Each dock will have one shiploader."	
5.4 Vessel Transportation	Page 5.4-36, footnote 33 at bottom of page	"[33] *Currents in the river at the project area are typically directed downriver or ebbing due to the river flow overriding the tidal currents. It is more efficient and safer to dock the ship heading into the current using the forward power of the engines which is stronger than the vessel's backing power. When the loaded vessel leaves the dock with the bow pointing upstream, the currents assist the vessel turning in the channel by pushing the bow around and downstream."*	This matter is under discussion with the Pilots and the Pilots have expressed a preference for the bow to be upstream. This is an unresolved matter and should not be presented here as definitive.
5.5 Noise and Vibration	Page 5.5-17, Section 5.5.5.1	"*Construction of the Proposed Action would result in the following direct impacts. These impacts would occur during the construction period in 2018.* • *Exceed Federal Railroad Administration Construction Noise Criteria* *Construction of the Proposed Action would result in noise levels exceeding FRA criteria at one residence (104 Bradford Place). This residence is the noise-sensitive receptor that is closest to the project area. The noise impact is predicted to occur only during pile driving when the maximum noise level is predicted to reach 83 dBA, exceeding the FRA criteria of 80 dBA for construction."*	(below duplicated from comment on Section 3.1.1.1 of the Noise & Vibration TR): The FRA standard that is used is not applicable to construction noise from the terminal, it has been arbitrarily applied as there is not regulation in Washington. The analysis is interesting but inappropriate. Washington State maximum permissible noise level regulations (WAC 173-60-040) do not apply to construction noise during daytime hours (between 7 a.m. and 10 p.m.).
5.5 Noise and Vibration	Page 5.5-31, MM NV-2, last line	" *the Applicant will fund all improvements."*	MBT-Longview has voluntarily proposed to fund additional

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		Change to: "the Applicant will fund additional electronics, barricades and crossing gates"	electronics, barricades and crossing gates to convert the railroad crossings to quiet crossings at Oregon Way and Industrial Way
5.5 Noise and Vibration	Page 5.5-31, MM NV-3, second line	"severe ~~and~~ impacts" (delete "and")	typo
5.6 Air Quality	Overall	Revise language to use more appropriate terminology for air emissions	Several instance of terminology that indicates author not air quality expert ('strength of emissions', 'freshly emitted').
5.6 Air Quality	Overall	Organize and provide more detail in calculations and assumptions.	Unable to thoroughly review findings (emissions/impacts). Authors used original URS spreadsheets (without reference), and made changes. Several references unclear or incorrect. We only received pdf version, so cannot follow links for calculations or review internal notes.
5.6 Air Quality	Page 5.6-3, Table 5.6-2	Remove Annual and 24-hour average SO2 standards for State.	These two standards are not applicable to this area (sunsetted).
5.6 Air Quality	Page 5.6-4, Section 5.6.1.2	Rewrite paragraph to more accurately describe Ecology's TAP program. Correct discussion about coal dust as TAP; include with general statement of TAP quantification for all sources with the speculative statements about coal dust.	This whole paragraph is misleading, and implies that all sources need to go through the entire TAP review process (including BACT). There are other TAP sources not mentioned (distillate combustions has TAP

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			emissions), and the comments about the 'possibility' of TAPs within coal dust is too far-reaching to include in this regulatory section.
5.6 Air Quality	Page 5.6-4, Section 5.6.2	Remove references to Direct and Indirect emissions/impacts. The sentence "Emissions are aggregated and regulated at a larger scale than a localized study, and therefore direct and indirect emissions are combined" should be removed altogether.	The split of Direct and Indirect impacts is not correctly applied to a Study Area. There is no scale factor for regulating these sources. Paragraph doesn't make sense and doesn't clearly define actual study areas for this report.
5.6 Air Quality	Page 5.6-4, Section 5.6.3.1	Make this a general list of sources (EPA, URS CET reports, Ecology, etc…) instead of a partial bibliography.	Besides being an incomplete list (eg, citing only Appendix L from the URS Air Quality report, instead of all parts, including all other appendices that are used directly and without reference), there are 2 repeated sources in this list. Make it more general and refer to complete references in Tech Report.
5.6 Air Quality	Page 5.6-5, Section 5.6.3.2, second paragraph	Correct PM2.5/10 definitions (… less than *or equal to* 2.5/10 micrometers in diameter…). Remove the 2 sentences about VOCs/HAPs.	Consistent with federal definitions. Make similar corrections throughout report (in several tables). See comments about this in Tech Report; there is no detailed identification of VOCs/HAPs in those appendices (as stated in Report), and this is just adding

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			concern over these HAPs which are extremely minor for this project. DPM is a TAP; that is the TAP to mention here.
5.6 Air Quality	Page 5.6-6, Section 5.6.3.2, Construction, last sentence	Remove "and model".	Construction emissions were calculated, but not 'modeled', which implies that they were modeled to assess impacts.
5.6 Air Quality	Page 5.6-7, Section 5.6.3.2, Coal Storage and Handling, last sentence	Remove last sentence.	Refer to comments regarding this reduced control efficiency in the Technical Report. The only basis for this reduction is a recent permit in Oregon. The current permit at the Millennium facility includes the 99% control efficiency for enclosure plus water fogging system (the 99% dust control measures are used *in place* of a negative pressure system).The information about negative pressure is too detailed here, and belongs in the Tech Report, if at all.
5.6 Air Quality	Page 5.6-7, Section 5.6.3.2, Vessel	Change heading to "Vessels", add 'marine' qualifier within text. Remove detail on operation schedule and numbers.	More than one vessel; note type of vessel (marine). Inconsistent with other sections that do not include this level of detail. These schedule details belong in Tech Report where they can be sufficiently explained.
5.6 Air Quality	Page 5.6-9, Section	Add qualifier on air quality concerns in Columbia	The visibility and regional haze

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	5.6.4.2, Air Quality along Transportation Routes, Rail Traffic, second paragraph	Gorge.	issues in the Gorge are documented as effects of Boardman power plant (reference ODEQ/SWCAA study). Discussions of other area concerns include in this section mention sources. These are not train-related sources.
5.6 Air Quality	Page 5.6-10, Section 5.6.5.1, Proposed Action, first paragraph	Clarify study area and impacts. Also clarify that 'impacts' are not addressed quantitatively for Construction; only emissions were evaluated.	Stating that they are aggregating/combining/regulating the direct/indirect impacts like this does not make sense. Simplify this to show breakdown of impacts for local and regional scales. (See comment above Page 5.6-4, Section 5.6.2.) This clarification needs to follow throughout this section; there is no mention of direct/indirect breakout in construction or operation.
5.6 Air Quality	Page 5.6-10, Section 5.6.5.1, Proposed Action, Construction, second paragraph	Either provide description of or remove Maximum Daily emissions.	Explain purpose of showing maximum daily emissions. How were these determined?
5.6 Air Quality	Pages 5.6-10-11, Section 5.6.5.1, Proposed Action, Construction, third paragraph and	Remove references to general conformity and de minimis levels, or make very clear (within text and table) that this is not subject to federal conformity rule.	General Conformity is not applicable to this project.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Table 5.6-3		
5.6 Air Quality	Pages 5.6-11-12, Tables 5.6-3 and 5.6-4	Define Project and Study areas (preferably prior to tables). Clarify sources associated with emissions.	Confusing breakout of sources and areas. These should be presented more clearly. Values in tables not thoroughly checked; hard to follow source/activity inclusion.
5.6 Air Quality	Page 5.6-13, Section 5.6.5.1, Proposed Action, Operations and Table 5.6-5	Same comment(s) as above (Pages 5.6-11-12, Tables 5.6-3 and 5.6-4)	As with construction section, confusing breakout of sources and areas. These should be presented more clearly. Values in tables not thoroughly checked; hard to follow source/activity inclusion.
5.6 Air Quality	Page 5.6-14, Section 5.6.5.1, Proposed Action, Operations, Impact Assessment, first paragraph, fifth sentence	Correct description of short-term emissions.	Not clear how short-term emissions were determined. Peak 1-hour and 24-hour rates are not necessarily the same, depending on source.
5.6 Air Quality	Page 5.6-14, Section 5.6.5.1, Proposed Action, Operations, Impact Assessment, second paragraph, last sentence	Provide more accurate summary of impacts and concentrations.	Meaningless to compare impact (without background) to NAAQS. Should provide better description of analysis results for all pollutants.
5.6 Air Quality	Page 5.6-18, Section 5.6.5.1, Washington State, first sentence	Correct sentence: "…are shown <u>in</u> Table 5.6-10" (add "in" before Table)	typo
5.6 Air Quality	Page 5.6-19, Section 5.6.5.1, Proposed Action, Sulfur	Introduce sulfate (deposition) before discussing (2nd paragraph). Add reference point for mercury deposition.	This is first, and only, mention of sulfates. Define sulfates in previous paragraph. Or remove

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Dioxide and Mercury Emissions		paragraph, and keep this level of detail in the technical report and appendix. Describe potential effects of this mercury deposition; the number alone is not meaningful (high? low? acceptable?)
5.6 Air Quality	Page 5.6-20, Section 5.6.5.2, No-Action Alternative, last paragraph, second sentence.	Remove reference to de minimis levels.	See comment above (Pages 5.6-10-11); General Conformity de minimis levels do not apply to this project.
5.7 Coal Dust	Page 5.7-1	*"The vibration of the train during transit can break larger pieces of coal into smaller particles, creating more dust."* Revise sentence to read: "*The movement of the train cars during transit <u>may</u> create vibrations that could break larger pieces of coal into smaller <u>pieces</u>*."	This statement needs to be substantiated, where is the study that measures this. If it can't be substantiated it needs to be deleted as misleading
5.7 Coal Dust	Page 5.7-2, first [t] paragraph	Use correct terminology for PM2.5 and PM10: particulate matter with a mean diameter less than *or equal to* [2.5/10] *micrometers* in diameter.	Consistent with federal definitions. "Micron" is old terminology and no longer correct.
5.7 Coal Dust	Page 5.7-2, second and third paragraphs	Remove sentence regarding NZ study as "most commonly cited". Combine these two paragraphs as examples of studies.	Number of citations is irrelevant; it does not make this study more valid. It is okay to describe these studies, but need to give them equal weight here, and not represent NZ 'thresholds' as better than Canadian ones. Also

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			need to stress that nuisance levels are subjective, and these values are used more as benchmarks than thresholds, or trigger/acceptable/maximum levels, as described throughout text.
5.7 Coal Dust	Page 5.7-4, Section 5.7.3.2 Impact Analysis, last paragraph	Explain what the "emissions rates" are that were adjusted.	First time mentioning emission rates, and we don't know what these are or where they came from. Instead, just saying how they were adjusted.
5.7 Coal Dust	Page 5.7-5, Direct Impacts, Table 5.7-2	Add reference to table. Correct values, as needed.	Reference appropriate Air Quality Tech Report appendices. Value for Ship Transfer and Conveyors uses lower control than proposed, making this emission rate 5 times higher than expected (see comments on Air Quality Tech Report). Value for Train Unloading is from original URS air quality appendix; update with ICF # (numbers have changed due to other changes made by ICF regarding train operations and characteristics).
5.7 Coal Dust	Page 5.7-5, Direct Impacts, second paragraph below Table 5.7-2	Remove the additional conservative factor (95%) for dust control, returning it back to 99%, consistent with the existing permit at the site.	The current facility permit was modified in 2014 to include a retrofit of coal handling areas with fogging systems. A control efficiency of 99% for enclosure

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			plus fogging was based on vendor information, and was approved by SWCAA during permitting. There is no basis for applying the lower control efficiency due to one draft permit from Oregon DEQ, as stated.
5.7 Coal Dust	Page 5.7-5, Direct Impacts, third paragraph below Table 5.7-2	Information here is misleading. Simplify, stating that data from other mines was used, and reference the technical report. Cannot say that analysis used "data from comparable mines".	Based on the technical report, although data from 11 mines was reviewed, the only 'comparing' done was that they used the "coal type with the highest near-field deposition" for this DEIS.
5.7 Coal Dust	Page 5.7-5, Direct Impacts, last paragraph	Remove paragraph. "*The U.S. Geological Survey is preparing a study that identifies methods for determining potential impacts on aquatic resources from coal dust exposure. The study, not yet published, uses two locations along rail lines in the Columbia River in Washington State as examples. The study will consider diet and other pathways of exposure and also compare results to levels of concern determined in previous studies. While not available for consideration for this Draft EIS, it is anticipated that the published study will be considered for the Final EIS."*	This information is not relevant to air quality. If there is an impact, it should be discussed within the appropriate element such as water quality or vegetation. If methods from this study are relevant to air quality evaluations, that would be only consideration for using it in the coal dust assessment, but citing this study here only adds unnecessary public concern and adds nothing to this section of the DEIS.
5.7 Coal Dust	Page 5.7-6, Indirect Impacts, fourth paragraph, first sentence	Remove *"…. , provided a representative sample"*, or provide more detail that this is representative of worst-case conditions.	This data is only representative of specific climate condition (dry season; at the end of approximately 4 months with

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			little precipitation); the study was purposefully done to collect coal dust, not to measure whether it occurs or not, or under varying (normal) conditions.
5.7 Coal Dust	Page 5.7-8, Indirect Impacts	Summarize these paragraphs, and make clear that 2014 coal train dust study was used along with conservative Australian coal data to develop emissions for analysis of impacts.	Details of the study (and the study itself) are included in the Technical Report. In this chapter, author should just state how this study was used to ground-truth and adjust emission factors. Showing various equations and random justifications for rail car assumptions is misleading and leads to misinformation when readers do not understand the technical background.
5.7 Coal Dust	Page 5.7-9, Section 5.7.4.1 Introduction to Coal Dust, first paragraph	Add agricultural and ground work (construction) to sources of particulates. Note that these examples are not exhaustive lists of natural or anthropogenic sources. Replace *"smoke from power plants and factories"* to *"industrial emissions"*.	The authors have listed anthropogenic sources that have negative imagery. Agriculture and construction are important contributors to particulate in the atmosphere. "Smoke" from power plants and factories also conjures a purely negative image; many emissions are due to fuel combustion, while there are many other non-smoke particulate emission sources, such as cooling towers and sanding/cutting/grinding

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			activities.
5.7 Coal Dust	Page 5.7-9, Section 5.7.4.1 Introduction to Coal Dust, second paragraph	Rewrite to be less definitive: "Coal dust ~~would~~ may also be generated and dispersed by wind~~s and air currents~~ during coal stockpiling …."	This is not necessarily fact, as controls, including natural controls (rain and coal moisture), would prevent this. No need to use "air current" in here as anything different from wind; the use of "air current" suggests coal dust moving long distances with large air masses, and could imply that a light current could move coal dust around, which is, in fact, highly unlikely.
5.7 Coal Dust	Page 5.7-9, Section 5.7.4.1 Introduction to Coal Dust, Coal Dust and Human Health	This section belongs in Air Quality. Refer to it in that section.	As described up front, the Coal Dust chapter is focused on nuisance issues. Federal and State air quality regulations include health-based standards.
5.7 Coal Dust	Page 5.7-10-11, Section 5.7.4.1 Introduction to Coal Dust, Coal Dust and Human Health	Remove paragraph discussing of Tongue River DEIS.	This information doesn't have anything to do with discussion on health effects. The modeling results shown here are not representative of the proposed Project; would need to show more relevance (similar operations and meteorological conditions) to be useful in this assessment. In addition, the discussion of modeled receptors has not yet been introduced and can be misleading to a reader,

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			confusing receptors "placed" for modeling with physical monitoring. The last sentence (regarding study conclusions) in this section is the only one that is appropriate here.
5.7 Coal Dust	Page 5.7-11, Section 5.7.4.1 Introduction to Coal Dust, Emissions, Dispersion, and Deposition of Coal Dust, first paragraph	Add bullets for "transfer or handling process", "enclosures or other physical barriers", "additional controls, such as spraying/fogging", and "shape (profile) of coal pile".	This list is for "rail cars and coal handling facilities", but seems to focus on rail cars only. Either add additional bullets or categorize properly.
5.7 Coal Dust	Page 5.7-11, Section 5.7.4.1 Introduction to Coal Dust, Emissions, Dispersion, and Deposition of Coal Dust, first paragraph after bullets	Delete second half of paragraph, starting with "Human exposure to deposited….."	This does not belong in this section. Section is for emissions, dispersion, and deposition. This is leading into impacts and effects again.
5.7 Coal Dust	Page 5.7-12-14, Section 5.7.4.1 Introduction to Coal Dust	Condense these three sections with the previous one under the composite title (Emissions, Dispersion, and Deposition of Coal Dust).	Confusing and repetitive. This is all part of "Introduction to Coal Dust" which is already 6 pages long. Detailed treatise of coal dust should be in tech report and references.
5.7 Coal Dust	Page 5.7-13, Section 5.7.4.1 Introduction	Remove all references to specific modeling impacts from other projects (paragraphs 2, 3, and	The modeling results shown here are not representative of the

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	to Coal Dust, Airborne Coal Dust Dispersion	4).	proposed Project; would need to show more relevance (similar operations and meteorological conditions) to be useful in this assessment.
5.7 Coal Dust	Page 5.7-14-15, Section 5.7.4.1 Introduction to Coal Dust	Ecological Impacts and Safety Impacts sections should be referred to other Chapters of the DEIS for those specific topics.	Although these issues are relevant to coal dust, this chapter of the DEIS does not include any assessment of potential ecological or safety impacts from this Project. Both topics are very complex. Besides being irrelevant, including descriptions of findings from other studies adds unnecessary negative and misleading information.
5.7 Coal Dust	Page 5.7-15, Section 5.7.4.2 Existing Conditions in the Study Area, Applicants Leased Area	Note that the existing facility has an air permit through SWCAA, and that all operations are in compliance.	This only mentions that "coal dust emissions are estimated to be small". State permitted levels to give more definitive sense of emissions at the facility.
5.7 Coal Dust	Page 5.7-15, Section 5.7.4.2 Existing Conditions in the Study Area, Cowlitz County	Instead of second and third paragraphs, just state attainment status and refer to Air Quality chapter/section.	The information regarding PM2.5 monitoring is related to wood smoke, not coal dust. The national toxics assessment and cancer risk discussion is not relevant to coal dust.
5.7 Coal Dust	Page 5.7-15, Section 5.7.4.2 Existing Conditions in the	Confirm this coal train count beyond Cowlitz County (seems like it was just copied over). Combine this section with previous one (Cowlitz	The two sections are almost identical. No need to separate.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Study Area, Washington State	County) if possible.	
5.7 Coal Dust	Page 5.7-17, Section 5.7.5 Impacts, Operations – Direct Impacts	Replace "would result in" with "has the potential to result in"	These modeled values are worst-case predictions (based on a combination of worst-case emissions aligned with worst-case meteorology). There is potential, but there is no certainty that this worst-case event would occur.
5.7 Coal Dust	Page 5.7-17, Section 5.7.5 Impacts, Operations – Direct Impacts	Add discussion describing how this was modeled. Specifically describe receptors/locations, and note why they are 'sensitive'. Remove label of "Trigger Level for Sensitive Areas". If referencing the NZ level at all, need to define sensitive areas vs. their other level(s).	Although some details are provided in Technical Report, there is NO discussion here of how it was done. There should be some basic description if results are provided (this is more than Summary section). The NZ "trigger" level is not an appropriate reference. Make it very clear that this is NOT a regulatory threshold. Discuss why both annual and monthly depositions rates were modeled; annual values are not referenced against anything.
5.7 Coal Dust	Page 5.7-20, Section 5.7.5 Impacts, Operations – Indirect Impacts, Reynolds Lead and BNSF Spur	Add discussion describing how this was modeled. . In addition, add discussion for first paragraph and Table 5.7-4 explaining how this is different from analysis performed in Air Quality report (coal only; describe sources removed).	Same comments as above. Why wasn't impact analysis for Direct sources of coal (facility sources) performed in previous section? (Inconsistent analyses.) Refer to Air Quality Technical report for modeling set up for impact

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			analysis. Why does Table 5.7-5 have an average and a maximum monthly deposition rate, while Table 5.7-4 has maximum annual and maximum monthly? (Inconsistent analyses.) Provide explanation of 'receptors', and make it clear that these are modeling locations. They should not be identified as 'sensitive', but rather as ambient (beyond facility boundary); there is no regulatory qualification for sensitive receptor associated with nuisance, and the maximum deposition location is not even in a residential area.
5.7 Coal Dust	Page 5.7-20-23, Section 5.7.5 Impacts, Operations – Indirect Impacts, BNSF Main Line	Add discussion describing how this was modeled.).. Remove Table 5.7-8 and associated text.	Same explanations as above. Table 5.7-8 is a toxics analysis that has had no introduction (until after the table). This does not belong here. Discussion of toxics belongs in Air Quality section; breaking out coal-only TAPs has no meaning, as the regulatory driver is ALL toxics from the proposed project. Additionally, the first tier of TAP analysis is review of the emission rates, which are not even mentioned here.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
C5.7 Coal Dust	Page 5.7-23, Section 5.7.5 Impacts, Operations – Indirect Impacts, Washington State (Outside Cowlitz County)	Add discussion describing how this was modeled. .	Same explanations as above. How was the whole state modeled (meteorology, terrain background concentrations, model)? The results do not make sense. If the BNSF Main Line has higher deposition rates due to increased train speeds, as suggested above, how come these trains do not have similar rates? Why is December the maximum month? This should be a wet month, with lower coal dust emission rates.
5.7 Coal Dust	Page 5.7-25, Section 5.7.6 Required Plans and Permits	Remove this section, or refer to Air Quality chapter.	Permitting is addressed in the Air Quality chapter. Coal Dust has no separate permitting requirements.
5.8 Greenhouse Gas Emissions and Climate Change		**See comments in comment letter and in Attachment 3.**	
Chapter 6 Cumulative Impacts			
Cumulative Impacts	Page 6-33, Section 6.3.2.7 – Wildlife, Aquatic Wildlife	Last sentence of paragraph 1. "~~*Impacts on p*~~*Pinnipeds and diving birds exhibit* ~~*would likely result in*~~*behavioral shifts and avoidance of those areas where underwater noise from in-water pile driving would occur."*	Paragraph 1, last sentence. Potential (could) effect is not an impact.
Volume !!			
Volume II Appendix A - References	Page A-14, Section 4.3 Wetlands	Revised the Grette 2014b reference as follows: Grette Associates, LLC. 2014b. *Bulk Product Terminal, Wetland and Stormwater Ditch Reconnaissance* ~~*Delineation*~~*Report–Parcel 10213*.	Bulk Terminal Wetland Report for Parcel 10213 is misidentified.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
Volume III.a: Built Environment Technical Reports			
SEPA Hazardous Materials Technical Report	Page 3-4	The section starting with " Project area preparations would involve preloading…" does not seem to fit in this section Caulking and Sealants	
SEPA Hazardous Materials Technical Report	Page3-8	Delete from bullet references to sulfuric acid, calcium hydroxide, and lime	The water treatment ponds are used to settle out sediment. Flocculants would be used. There is a chance that the water distributi8on systems may need the addition of an antiscalant to manage the hardness in the process waters.
SEPA Hazardous Materials Technical Report	Page 3-8	Delete the bullet: "Chemicals used in the on-site laboratory…"	There is no on-site laboratory as part of the Proposed Action.
SEPA Hazardous Materials Technical Report	Page 3-8	Delete reference to coal handled during operation as a hazardous material	See substantive comments above in Comment Letter. Coal is not classified as a hazardous material, under any definition.
Volume III.b: Natural Environment Technical Reports			
SEPA Water Quality Technical Report	Page 2-6	Including parameters from Weyerhaeuser's permit seems inappropriate.	The discharges from their facility are completely different than the proposed action. If there is a state water quality limit then reference that and not a reference to another permit
SEPA Water Quality Technical	Page 3-2	*Proposed Action could have the following adverse*	The DEIS lists the potential

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
Report		*impacts on water resources…..*	impacts in the bulleted list but they do not appear to be discussed within the text – text and list should be made consistent
SEPA Ground Water Technical Report	Page 2-19	Footnote CAP completion reference 2015	
SEPA Fish Technical Report	Page 1-7, Figure 3: Study Area	Revise the figure to correctly identify the study area as extending upriver to RM 67.	The upstream project area should go to RM 67, which is correctly described in the text.
SEPA Fish Technical Report	Page 2-5, Table 2	Suggested global edit: Adopt the elevations relative to CRD datum in order to express depths. *"DWZ: The area waterward ~~extending from edge~~ of the SWZ, ranging in depth from -20 ft CRD to deeper than -40 feet CRD. ~~approximately 450 feet from the shore at a depth of 31 feet, outward to a maximum depth of 56 feet deep approximately 1,200 feet from the shore.~~"*	This is the first example of a global comment regarding depths for habitat zones. The supporting/source documents (Grette 2014a - f) use the CRD datum for all depths (e.g., -20 ft CRD). The narrative in the SEPA Fish Technical report uses an absolute depth (e.g., 31 feet deep). While it appears this is depth relative to OHW, it is confusing. Water levels in this area are highly variable due to season and daily factors (e.g., tides).
SEPA Fish Technical Report	Page 2-6, Section 2.2.2 - Study Area	*"TTS: Temporary hearing damage"* Revise the definition above to: TSS: Temporary loss of hearing sensitivity Reference to be added:	The definition for TTS should be changed to something that does not indicate injury (temporary or otherwise). TSS is more accurately described as a temporary loss of hearing

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		Popper, A.N., Hawkins, A.D., Fay, R.R., Mann, D., Bartol, S., Carlson, T., Coombs, S., Ellison, W.T., Gentry, R., Halvorsen, M.B., Løkkeborg, S., Rogers, P., Southall, B.L., Zeddies, D., Tavolga, W.N. (2014) Sound Exposure Guidelines for Fishes and Sea Turtles: A Technical Report prepared by ANSI-Accredited Standards Committee S3/SC1 and registered with ANSI. ASA S3/SC1.4 TR-2014. Springer and ASA Press, Cham, Switzerland.	sensitivity, not injury (e.g., Popper et al. 2014). Note: Popper et al. 2014 is not cited in the DEIS, and is provided here for reference.
SEPA Fish Technical Report	Page 2-7, Figure 5	Revise Figure 5 to express elevations relative to CRD datum.	Figure 5 – please apply the same comment as for page 2-5 re, expressing depths relative to CRD rather than as absolutes (this figure indicates an absolute value relative to 11.1 ft OHW).
SEPA Fish Technical Report	Page 2-9, Section 2.2.2.1 – Aquatic Habitat Types, Active Channel Margin	Suggest revising the document to express depths relative to CRD datum for consistency. OHW at the site is 11.1 ft CRD. This includes modifying the body text and footnote on this page. *"…and OHW is at approximately +<u>11.1</u> ~~7.0~~ feet CRD (National Oceanic and Atmospheric Administration 2013~~, U.S. Army Corps of Engineers 2004a).~~[5]"* And Footnote: "~~The OHW is equivalent to the mean higher high water line in the tidally influenced Lower Columbia River.~~"	The definition of Ordinary High Water is misleading. OHW has been defined by the US Army Corps in the Lower Columbia River according to river mile in feet, CRD. At the site, OHW is 11.1 ft CRD. This is the first example of a global comment regarding Ordinary High Water. On page 2-6 (subsection Riparian) there is the first reference to OHW in this document. *"The riparian zone includes lands less than 200 feet landward from ordinary high water (OHW)*

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			(+11.1 ft CRD)." This excerpt references the same value which is used in the source documents (Grette 2014 c). This elevation for OHW has been used for at least the last 5 years in a number of project and permitting documents for the Project as well as other actions at this site (e.g., Dock 1 maintenance), and is consistent with the OHW level used for Port of Longview projects approximately 3 miles upstream. On page 2-9 (subsection Active Channel Margin), there is a second reference to OHW which defines it at 7.0 ft CRD, which is equivalent to MHHW (per the NOAA Tide Station at the Port of Longview). USACE 2004a (cited here) is specific to the Portland Harbor and lower Willamette River and does not provide pertinent information for this location.
SEPA Fish Technical Report	Page 2-9, Section 2.2.2.1 – Aquatic Habitat Types, Deep Water Zone	*"The DWZ habitat type encompasses about <u>117</u> ~~115~~ acres…"*	The Shoreline Habitat Inventory Report lists Deep Water Zone (DWZ) as 117 acres. (Grette Associates, 2014a)
SEPA Fish Technical Report	Page 2-10 to 2-23,	We suggest that Table 3 and the narrative in this	Table 3 is confusing because it

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Section 2.2.2.3: Focus Fish Species	discussion be modified for consistency with the impact discussion. See Table 5 and associated narrative.	combines adults, juvenile fish, yearlings, and subyearlings (see Table 7 for comparison) but distinguishes among the habitat type (ACM, SMZ, DMZ). Also, it is not consistent with the information from the source document (assumed to be Grette 2014c). For example, coho could be present in the DWZ in the winter and summer. Finally, for many fish ESUs, this table appears to add habitat use in the SMZ which was not included in the summary tables in the source documents. This is not necessarily supported in narrative citations (e.g. Roegner and Sobocinski 2008, cited 2-17) did not demonstrate abundant steelhead in beach seine or purse seine data, see slide 7). This table (Table 7) and narrative used for impact discussion (Section 3.1.1.1) is much more consistent with the information in the source documents.
SEPA Fish Technical Report	Page 2-18, Section 2.2.2.3 – Focus Fish Species, Bull Trout	Suggest revising text to focus on infrequent use in DMZ by bull trout.	Narrative indicates that, in addition to the potential DMZ use (infrequent, very low numbers) by adult bull trout, that

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			the ACM and SWZ could be used as shallow water rearing areas by subadult bull trout. Unlike subyearling and yearling salmonids, which are smaller and likely to rely on shallow waters, bull trout (infrequently present) in the Columbia River are not likely to be present in these areas. While it is possible, based on the general lack of bull trout observed in beach and purse seine data, it is probably not appropriate to characterize them as regularly using or likely to use these areas.
SEPA Fish Technical Report	Page 2-19, Section 2.2.2.3 – Focus Fish Species, Eulachon	Suggest revising Paragraph 3 as follows: *WDFW and ODFW conducted plankton tows to sample for eulachon eggs and larvae in the water column at an index site at about RM 34 (Report A in Mallette 2014).* ~~*Recent studies have documented egg and larvael stage eulachon between the Port of Longview above Barlow Point and the channel below the Cowlitz River mouth, including four sample sites offshore of the Project Area (Mallette 2014).*~~ *Peak larval abundance occurred in mid-March during two of the three survey years and from late April to early May in the third. As part of a related one-time sampling effort, eulachon eggs/larvae were documented in plankton tows at six sample sites*	Paragraph 3, sentence 1 acknowledges documented egg and larvae eulachon presence near the project (see Table 1 in Report B of Mallette 2014). Plankton tow samples documented presence of eulachon "egg/larvae = yes" in all plankton tows, which were taken on a single day (2/10/12). The next sentence, relates to data from Report A of Mallette 2014, which is for peak larval abundance over three survey years at a WDFW index site

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		(inshore and offshore) near the proposed CET between RM 62.8 to 64.0 in February 2012 (Report B in Mallette 2014)."	further downstream, and is a broader measure of larval downstream transport timing for the lower Columbia River and many tributaries.
SEPA Fish Technical Report	Page 2-25, Section 2.2.2.5 – Sediment and Water Quality Conditions	*"Turbidity in the study area is variable based on a number of factors. For example, over five days of water quality monitoring for dredging, background levels (upstream from active dredging) ~~consistently~~ ranged~~s~~ from the mid-20s to the mid-60s ~~29 to 67~~ nephelometric turbidity units (NTUs) at all depths (US Army corps of Engineers Dredged Material Management Office 2010 in Grette 2014c)."*	Paragraph 2, sentence 4, re. turbidity levels. These turbidity levels appear to be based on the background levels observed during water quality monitoring in December 2011 and January 2012 during dredging. Although these levels are representative of the background levels observed, they are from a brief period during a single season.
SEPA Fish Technical Report	Page 3-2, Section 3.1.1.1 – Construction: Direct Impacts, Temporarily Alter or Permanently Remove Aquatic Habitat	*"A total of 603 ~~610~~ of the 622 ~~630~~ 36-inch-diameter steel piles required for the trestle and docks would be placed below the OHW mark, permanently removing an area equivalent to 0.10 acre (4,263 ~~4,312~~ square feet) of benthic habitat."*	This is a global edit regarding an incorrectly stated number of piles and associated pile footprint. The current pile numbers are 622 total, 603 of which would be below OHW. This results in removal of 4,263 sq ft of river bottom (Grette Associates, LLC. 2014f; Table 1, p. 17).
SEPA Fish Technical Report	Pages 3-5 to 3-18, Section 3.1.1.1 – Construction: Direct Impacts, Increased Underwater Noise during Pile Driving	Global edit. Please check citations to Grette documents a, b, c, etc.	The citations for Grette documents do not track with the references section.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
SEPA Fish Technical Report	Page 3-5, Section 3.1.1.1 – Construction: Direct Impacts, Increased Underwater Noise during Pile Driving	Revise the following text to be consistent with the source document. *"Docks 2 and 3 and their associated trestle would be supported by 622 ~~630~~ 36-inch steel piles, 603~~610~~ of which would be installed in aquatic areas below OHW.""*	Global pile number and footprint edit (Grette Associates, LLC. 2014f; Table 1, p. 17).
SEPA Fish Technical Report	Page 3-9, Section 3.1.1.1 – Construction: Direct Impacts, Distance to Injury and Disturbance Thresholds	*"To install 603 ~~610~~ pilings in-water would require two years, based on the proposed in-water work window for impact pile driving."*	Global pile number and footprint edit (Grette Associates, LLC. 2014f; Table 1, p. 17).
SEPA Fish Technical Report	Pages 3-11, Section 3.1.1.1 – Construction: Direct Impacts, Increased Underwater Noise during Pile Driving, Juvenile Chinook Salmon Habitat Use and Timing	Revise the beginning of Paragraph 1 with the following: *The majority of juvenile Chinook from all ESUs outmigrate through the study area during the spring and summer or early fall. However, a relatively small number of subyearlings from ocean-type ESUs may be present in the ~~In general, juvenile Chinook salmon outmigrate through the study area within~~ SWZ and DWZ ~~habitat~~ during some or all of the September 1-December 31 proposed ~~in-water proposed~~ work window for impact pile driving (Table 7). Overall, habitat use and timing for juvenile Chinook salmon is summarized as follows (Grette 2014a).*	Paragraph 1 needs context in terms of timing and relative abundance.
SEPA Fish Technical Report	Page 3-21, Section 3.1.1.3 – Operations: Direct Impacts, Increased	Revise Paragraph 2 as follows: "The extent or magnitude to which an increase in overwater surface area may alter the predator-prey relationship at the project area is	Page 3-12, Paragraph 2 concludes that it is assumed that increased overwater structure would change predator/prey

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Shading	unknown, but it is assumed that the relationship could ~~would~~ change and an increase in predation could occur where larger subyearling, yearling, or larger juvenile fish encounter the Dock 2 and 3 structures in the DWZ. ~~would be likely~~. This likely would not apply to smaller subyearling fish encountering the trestle in the ACM and SWZ.	relationships and increase predation, although extent or magnitude is unknown. This is specific to the Dock 2 and 3 structures, not the trestle. This was addressed in a supporting document which was not cited in the SEPA technical report (Docks 2 and 3 and Associated Trestle: Indirect Effects of Structures and Site Operations, Grette Associates 2014). As discussed in that document, based on the depth and offshore location, increased predation risk would not apply to those small subyearling fish utilizing shallow water (SMZ, ACM); see page 19 of that document. Larger subyearlings, and yearling and other juvenile fish using deep waters may experience an increased risk of predation, but this would apply to a relatively small number of fish based on the small width of the structure relative to the channel width at this location.
SEPA Fish Technical Report	Page 3-21, Section 3.1.1.3 – Operations: Direct	*"Source sound levels of bulk carrier vessels were measured in Puget Sound at between 187.9 and 198.2 dB re 1uPA at 1 meter when vessels were*	Page 3-12, Paragraph 2 cites bulk carrier vessel source sounds in Puget Sound. These values have

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Impacts, Vessel Noise	*travelling between 9.0 and 11.0 knots (Hemmera Environchem et al. 2014)."*	little meaning if not referenced to dB_{peak} or dB_{RMS}. Without that context they cannot reasonably be compared to the behavioral threshold (150 dB_{RMS}).
SEPA Fish Technical Report	Page 3-30, Section 3.1.1.4 – Operations: Indirect Impacts, Affect Commercial and Recreational Fishing	*"If ~~A~~adult fish targeted in commercial and recreational fishing were to alter behavior in response to underwater noise from vessels, they could avoid the navigation lanes or migrate quickly through them. ~~would likely migrate outside of the navigation channel to avoid increased underwater noise levels.~~ Commercial and recreational fishing vessels would not likely be fishing in the navigation channel when large vessels are present. Therefore, the Proposed Action would be unlikely to significantly reduce commercial or recreational fishing catches or limit access for fishing activities."*	Paragraph 1 posits that increased vessel traffic could cause behavioral responses in fish (presumably from disturbance associated with increased noise and vessel movement), and that adult fish would likely migrate outside of the navigation channel to avoid increased noise. This is too strong of a statement which is not supported by our understanding of fish behavioral responses to increased underwater sound or the actual levels and extents of underwater sound associated with vessel traffic. It is possible that such a response could happen in some cases. In either case, the conclusion of unlikely to significantly reduce commercial or recreational fishing catches is correct, but the distinction regarding certainty of effect is important.
SEPA Wildlife Technical Report	Page 2-7, Section	Revised the ACM, SWZ and DWZ elevations as	Elevations and depths for habitat

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	2.2.2 - Aquatic Habitat	follows: ACM is OHW (11.1 ft CRD) to 0 ft CRD; SWZ is 0 ft CRD to -20 ft CRD; DWZ is waterward of -20 ft CRD.	zones should be expressed relative to CRD throughout the documents for consistency.
SEPA Wildlife Technical Report	Page 3-4, Section 3.1.1.1 – Construction: Direct Impacts, Temporary Impacts on Wildlife Habitat	Overall, this section would benefit from clarity regarding the area considered.	For temporary effects it seems the area considered should be the 0.5 mile "buffer" around the project site, since the project area itself will be permanently altered at the outset of project construction and is addressed in the previous section.
SEPA Wildlife Technical Report	Page 3-4 to 3-5, Section 3.1.1.1 – Construction: Direct Impacts, Temporary Impacts on Wildlife Habitat	The section on the displacement/mortality should be reconsidered.	This appears to address the area which will be permanent removed. There are no temporary impacts – once it's been removed the displacement is permanent.
SEPA Wildlife Technical Report	Page 3-5, Section 3.1.1.1 – Construction: Direct Impacts, Temporary Impacts on Wildlife Habitat	We request that the following sentence be added to the end of the final paragraph on page 3-5: "Impacts to steaked horned lark will be evaluated in detail in the Project's Biological Assessment and ultimately determined in the ESA consultation process."	We disagree with ICF's use of marbled murrelet as a surrogate for analyzing potential impacts to streaked horned lark due to their significantly different habitat use. Since streaked horned lark is an ESA-listed species, the project's Biological Assessment and the associated ESA consultation process will evaluate impacts in detail.
SEPA Wildlife Technical Report	Page 3-6 to 3-13, Section 3.1.1.1 – Construction: Direct	Effects of dredging on pinnipeds: The turbidity effects discussion would benefit from context of limited, minimal, and temporary increases in	

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
	Impacts, Aquatic Habitat and Wildlife Habitat	turbidity. Also, there is a timing component to consider regarding likelihood of presence for marine mammals similar to what is in the pile driving impact analysis.	
SEPA Wildlife Technical Report	Page 3-17, Section 3.1.1.1 – Construction: Direct Impacts, Aquatic Habitat and Wildlife Habitat	Aquatic spills and leaks –Reconsider conclusion regarding toxic or subacute impacts.	This section should mirror the section in the SEPA fish technical report, which focuses on the low potential and volume of spills that may occur in aquatic areas.
SEPA Wildlife Technical Report	Page 3-19, Section 3.1.1.3 – Operations: Direct Impacts, Produce Coal Dust	Consider revising the following conclusion: *"…to what extent coal dust could affect wildlife species and their habitats over the life of the Proposed Action is unknown."*	This statement implies too much impact.
SEPA Wildlife Technical Report	Page 3-24, Section 3.1.1.4 – Operations: Indirect Impacts	Effects of dredging on pinnipeds: Suggest revising this section to adopt the construction analysis by reference instead of repeating/summarizing it (as is done for "noise impacts from maintenance dredging" for terrestrial species).	This paragraph contains the same content as the construction discussion, and the same suggested edits for that section would apply (see suggested revisions above for Page 3-6 to 3-13, Section 3.1.1.1 – Aquatic Habitat and Wildlife Habitat)
SEPA Vegetation Technical Report	Page 2-19, Section 2.2.2.2– Land Cover Classification and Vegetation Cover Types	We request that ICF double-check calculations of habitat area, and in particular review the mapped upland forested habitats for accuracy.	It appears that habitat acres are based primarily on ICF's own vegetation surveys. ICF used slightly different habitat/vegetation type categories, making it difficult to

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			track down specific differences in the two analyses. However, it appears that general habitat categories mapped by Grette Associates do not exactly match those mapped by ICF. Specifically, we identified less forested and scrub-shrub habitat than ICF, on parcel 61950 in particular. Nevertheless, we agree in principle with the analysis of the site as largely developed/disturbed with isolated patches of habitat potentially used by wildlife.
Volume IIIc Operations Technical Reports, Part 1			
SEPA Rail Transportation TR Appendix A Coal Train Operating Plans	Page A-2	Coal Train Operating Plans should be regarded as indicative but not contractual. Also there is a variety of abbreviation which we cannot find in the Abbreviations and Acronyms list. Eg ST	These plans have not been developed with MBTL. They should be regarded as indicative but not contractual.
SEPA Rail Transportation TR Appendix A Coal Train Operating Plans	Page A-2	*"MBTL crew takes lead locomotives to end of loading loop, couple to empty train when unloading completed. From dumper, train proceeds into storage track awaiting outbound train crew"*	This comment seems to indicate that locomotives would be uncoupled from rail cars. This is a new criterion that has not been discussed before and was not part of any discussions with BNSF. MBT-L proposes to keep the locomotives connected to the trains. The trains would be pushed around by indexer and

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			when ready to leave, someone hops into the locomotive and drives – need to recheck the whole train when you reconnect locomotive
Volume IIIc Operations Technical Reports, Part 2			
SEPA Air Quality Technical Report	Technical Report, Page i	Add more description to "Appendix A. Air Quality Data". Should also revise all headers within appendices and reference throughout text correctly.	Old URS appendices A-J were modified and lumped together here. Confusing with references throughout report.
SEPA Air Quality Technical Report	Technical Report, Page 1-1, Section 1.1, 1st paragraph	Remove "blending" as part of proposed processes at terminal.	Blending is not part of the process, and emissions have not been estimated for this process.
SEPA Air Quality Technical Report	Technical Report, Page 1-4, Section 1.1.1, 3rd paragraph	Remove "blending" as part of proposed processes at terminal.	Blending is not part of the process, and emissions have not been estimated for this process.
SEPA Air Quality Technical Report	Technical Report, Page 1-7, Table 2	Remove Annual and 24-hour average SO2 standards for State.	These two standards are not applicable to this area (sunsetted).
SEPA Air Quality Technical Report	Technical Report, Page 1-8, Section 1.2.2, last paragraph	See comment above under Page 5.6-4, Section 5.6.1.2	This version in Technical Report includes mention of DPM and should be retained as that is primary TAP of concern from this project.
SEPA Air Quality Technical Report	Technical Report, Page 1-8, Section 1.3	See comment above under Page 5.6-4, Section 5.6.2	
SEPA Air Quality Technical Report	Technical Report, Page 2-1, Chapter 2	Move the introduction and content of Section 2.1 (Methods) after Section 2.2 (the real Existing Conditions section). Section 2.1 content includes description of the project air emission sources	This Chapter is for Existing Conditions. Section 2.2 (also title Existing Conditions) is the only piece that belongs in here.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		and processes and methodologies for assessment; this belongs in a different Chapter (or rename Chapter).	
SEPA Air Quality Technical Report	Technical Report, Page 2-1, Section 2.1, last sentence	Correct reference (add detail). Remove last part of sentence addressing applicable VOCs and HAPs.	Appendix A includes many parts. There is a specific header for construction calculations which includes various spreadsheets. There is no list of VOCs/HAPs.
SEPA Air Quality Technical Report	Technical Report, Page 2-3, Section 2.1.2.1, Construction Equipment	Correct reference for NONROAD emission factors. Add detail to Appendix A reference in last sentence.	Multiple references cited, including Appendix L of the URS Air Quality Report, which is the modeling analysis, which has nothing to do with construction emissions. Appendix A has many parts; be more specific about which parts apply to construction emissions.
SEPA Air Quality Technical Report	Technical Report, Page 2-3, Section 2.1.2.1, River Barges	Remove footnote reference for HAP factors.	Unnecessary and inconsistent to include this level of emission calculation detail here. Confusing and incomplete terminology to have footnote mention only 'HAP factors'.
SEPA Air Quality Technical Report	Technical Report, Page 2-4, Section 2.1.2.1, Vehicle Delays at Rail Crossings and Construction Worker Commute Vehicles	Add information/reference from traffic report.	Amount of detail here is inconsistent with other source area emission sections, and there is no detail on calculations shown in Appendices. Provide clearer reference than Appendix A.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
SEPA Air Quality Technical Report	Technical Report, Page 2-4, Section 2.1.2.2, Coal Storage and Handling	Remove the additional conservative factor (95%) for dust control, returning it back to 99%, consistent with the existing permit at the site.	The current facility permit was modified in 2014 to include a retrofit of coal handling areas with fogging systems. A control efficiency of 99% for enclosure plus fogging was based on vendor information, and was approved by SWCAA during permitting. There is no basis for applying the lower control efficiency due to one draft permit from Oregon DEQ, as stated.
SEPA Air Quality Technical Report	Technical Report, Page 2-4, Section 2.1.2.2, Locomotives	Provide detail on emissions in appendices.	Unable to check emission calculations, which have changed significantly since URS report/tables. Some references appear to be incomplete or wrong. Unload hours in text doesn't match table value. Appendix 'Tabs' referenced in Table 3 are old URS Appendix headings.
SEPA Air Quality Technical Report	Technical Report, Page 2-5, Section 2.1.2.2, Vessel	Provide detail on emissions in appendices.	There are several changes in assumptions (eg. hours) without explanation/justification.
SEPA Air Quality Technical Report	Technical Report, Page 2-5, Table 3	Footnote a should be revised to read: *The on-site coal transfers would occur in enclosed areas (i.e.rotary coal car dump and conveyors), as well as areas that are not enclosed (i.e., coal piles ~~and the unloading of rail cars~~).”*	Footnote a to Table 3 is incorrect in its description of unloading of rail cars –rail car unloading would be done within an enclosed building
SEPA Air Quality Technical	Technical Report,	See comments above:	What is the purpose of daily

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
Report	Page 3-1-3, Section 3.1.1.1, Construction	Page 5.6-10, Section 5.6.5.1, Proposed Action, Construction, 2nd paragraph. Pages 5.6-10-11, Section 5.6.5.1, Proposed Action, Construction, 3rd paragraph and Table 5.6-3. Pages 5.6-11-12, Tables 5.6-3 and 5.6-4.	emissions for construction? General Conformity is not applicable to this project. Tables are confusing.
SEPA Air Quality Technical Report	Technical Report, Page 3-4-8, Section 3.1.1.2, Operations	See comments above: Page 5.6-13, Section 5.6.5.1, Proposed Action, Operations and Table 5.6-5. Page 5.6-14, Section 5.6.5.1, Proposed Action, Operations, Impact Assessment, first paragraph, fifth sentence. Page 5.6-14, Section 5.6.5.1, Proposed Action, Operations, Impact Assessment, second paragraph, last sentence	Difficult to assess emissions development in Appendices. Changes in emission factors (as compared to original URS report) caused some much higher impacts, notably for SO2 impacts from cargo vessels and CO from trains. Provide more justification for use of these factors.
SEPA Air Quality Technical Report	Technical Report, Page 3-8-10, Section 3.1.1.2, Proposed Action and Cowlitz County/Washington State Emissions Comparison	Clarify increases in source type vs. emissions. Verify emission factors (see comments above).	There seems to be a discrepancy between source increases and emission increases as compared to similar county/state sources. This indicates emission factors for some pollutants are different for similar sources. Explain these discrepancies, and justify emission factors. Rail emissions within County showing highest increase in PM10, while within state, the maximum increase are for CO and NOx from same sources. Details should be clarified and referenced in appendices.

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
SEPA Air Quality Technical Report	Technical Report, Page 3-9, Section 3.1.2, No-Action Alternative, 2nd to last sentence	Remove reference to de minimis.	General Conformity is not applicable to this project. Also, only construction emissions were compared to de minimis, not operations (which were modeled). Use another reference point.
SEPA Coal Technical Report (Coal Dust Emissions)	Technical Report, Page 18, Section 2.2.4 Coal Dust Monitoring	Rewrite/reorganize 1st paragraph. The comparison of the T&B Systems study results to Jaffe report is not correct (2nd bullet). Neither study identifies the makeup of the PM2.5 fraction, it is known to contain diesel combustion emissions, iron oxide particles, general dust and possibly coal particles. Jaffe report also shows "super dusters" which he did not verify to be coal, but has called them coal. This is poor science to base your conclusions on an invalidated assumption. It is my assumption from observation of the Jaffe report and a presentation by him on the matter that the super dusters are pet coke trains – not even coal.	This section starts off confusing with "As described in Section 3.1.3, Impact Analysis,…." and then starts discussing results of the T&B Systems study, which hasn't even been introduced yet. The whole section should be rewritten for clarity and organization.
SEPA Coal Dust Technical Report (Coal Dust Emissions)	Technical Report, Page 21, Paragraph describing Figure 4	Either remove figure and associated paragraph completely (if there is no reference for it), or at least add caveat that this linear regression is based on very limited data., and delete last sentence citing use of the lower (61%) emissions reduction effectiveness for subsequent modeling of coal trains instead of 85%.	OK to describe T&B Systems study, but do not make additional conclusions about the study within the DEIS Technical Report. This does not explain what 'modeling' is being compared to the study observations. Need a reference for Figure 4, as it does

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
			not relate to anything included with this report. The application of 85% control is cited in DEIS chapter (BNSF Coal Loading Rule), but is never mentioned in this Technical Report, and the 61% is never mentioned in the DEIS chapter. And there is no further mention of either control level applied during emission estimation (in Coal Dust OR Air quality sections).
SEPA Rail Transportation TR Appendix A Coal Train Operating Plans	Technical Report, Page 21	Figure 4	We question what Figure 4 or the paragraph before it means, and expect that BNSF are being challenged by saying the 85% reduction in dust from trains is invalid. There is not any reference to this graph in the Technical Report, or T&B Report. Also, if it is based on the T&B report it is unreliable due to their inconclusive findings.
SEPA Noise and Vibration TR	Page 2-16	typo for description of the FRP cladding material: should be 8 *ounces* per square foot, not 8 pounds per square foot.	Despite the typo, the corresponding estimated sound transmission loss values appear to be correct in Table 7.
SEPA Noise and Vibration TR	Page 3-1, Section 3.1.1.1	3.1.1.1 Construction: Direct Impacts "Construction of the Proposed Action would result in the following direct impacts. These impacts would occur during the construction	The analysis in the extract is inappropriate and misleading and should be deleted. The FRA standard that is used is

Environmental Resource	Page Number or Section Number	Text Correction/Revision	Comment
		period in 2018. • Exceed Federal Railroad Administration Construction Noise Criteria • Construction of the Proposed Action would result in noise levels exceeding FRA criteria at one residence (104 Bradford Place). This residence is the noise-sensitive receptor that is closest to the project area. The noise impact is predicted to occur only during pile driving when the maximum noise level is predicted to reach 83 dBA, exceeding the FRA criteria of 80 dBA for construction."	not applicable to construction noise from the terminal, it has been arbitrarily applied as there is not regulation in Washington. The analysis is inappropriate. Washington State maximum permissible noise level regulations (WAC 173-60-040) do not apply to construction noise during daytime hours (between 7 a.m. and 10 p.m.).
SEPA Noise and Vibration TR Appendix A – Existing Ambient Sound Pressure Level Survey Data	Page A-1	The Figures in this section do not have any meaningful units or labels on the X or Y Axis or colored lines	Please add label or key
SEPA Noise and Vibration TR Appendix B Construction Noise Impact Analysis	Page B-1	In Table B-1 the FRA standard for construction noise limits is used inappropriately. FRA construction noise standard applies to construction of rail lines, not to construction of a coal export terminal.	
Appendix H	H-5	Wrong Table number. Should be Table H-2	typo

ATTACHMENT 3 - DEIS COMMENTS, TECHNICAL RESPONSE, ANALYSIS OF POPULATION-LEVEL IMPACTS ON TRIBAL FISH RESOURCES IN ZONE 6

Millennium Coal Export Terminal
Longview, Washington

DEIS Comments, Technical Response
Analysis of Population-level Impacts on Tribal Fish Resources in Zone 6

June 8, 2016

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TABLE OF CONTENTS

1 INTRODUCTION 1

2 POPULATIONS CONTRIBUTING TO TRIBAL FISH RESOURCES 2

3 CONSTRUCTION IMPACTS 5
3.1 Construction Timing as a Minimization Measure 5
3.2 Construction Impacts: Dredging 8
3.3 Construction Impacts: Impact Pile Driving 10

4 OPERATIONS IMPACTS 14
4.1 Operations – Direct Impacts 14
4.1.1 Increased Shading that Affects Fish and Fish Habitat 14
4.2 Operations – Indirect Impacts 18
4.2.1 Cause Fish Stranding from Vessel Wakes 18

5 SUMMARY AND CONCLUSION ON POPULATION-LEVEL EFFECTS 26

6 REFERENCES 28

LIST OF TABLES

Table 1. Activity specific work windows proposed for the Project.....6
Table 2. Anticipated presence and habitat use for Zone 6 harvestable salmonid populations in the tidal freshwater region of Columbia River.....7
Table 3. Genetic-stock composition of subyearling Chinook salmon captured in the lower portion of the tidal freshwater region of the Columbia River estuary by month.....21
Table 4. Summary of expected presence in the different habitat zones between RM 33 and 63 of the tidal freshwater region for juvenile Chinook salmon from all Columbia River ESUs.....24

LIST OF FIGURES

Figure 1. Yearling Chinook cumulative survival probability, adapted from McMichael et al. 2011, with Coal Export Terminal location shown (~RKm 101).....17
Figure 2. Steelhead smolt cumulative survival probability, adapted from McMichael et al. 2011, with Coal Export Terminal location shown (~RKm 101). 17
Figure 3. Subyearling Chinook cumulative survival probability, adapted from McMichael et al. 2011, with Coal Export Terminal shown (~RKm 101).....18
Figure 4. The subset of sampling sites of Roegner et al. (2012, 2013) that were located between RM 33 and 70 of the Columbia River 20
Figure 5. Spatiotemporal distributions, by ESU, of Chinook salmon fry and fingerlings captured at sites in the lower portion of the tidal freshwater region of the Columbia River estuary, between approximately RM 34 and 70.....22

1 INTRODUCTION

Section 4.7 (Fish) of the Draft Environmental Impact Statement (DEIS) describes the potential direct and indirect impacts resulting from the construction and operation of the proposed Coal Export Terminal that could have an effect on fish (ICF 2016). The impacts listed were described qualitatively and none of the impacts acting individually or collectively were concluded to cause significant unavoidable adverse impacts to fish in Section 4.7.8 (Unavoidable and Significant Adverse Environmental Impacts).

This document evaluates the likelihood that impacts could reduce the abundance of fish available in the tribal commercial, subsistence, and ceremonial fishing zone on the Columbia River that is known as Zone 6. Zone 6 is a 147 mile stretch between the Bonneville Dam (River Mile 146) and McNary Dam in which commercial fishing is set aside exclusively for tribal fishers. Zone 6 begins approximately 83 river miles upstream from the Project Site. The approach used in this document is to first describe the timing and habitat use of the salmon and steelhead runs in the river from the Project Site (RM 63) to the mouth to determine which groups of fish have the potential to be exposed to impacts, and then to evaluate the likely magnitude of the impact. The results of the analysis are used to draw conclusions about the potential for population-level impacts to occur to fish that would be captured in the Zone 6 fishery.

Note that Sections 3 Built Environment and 4.7 Natural Environment – Fish of the DEIS define direct and indirect impacts associated with construction and operations somewhat differently. Because Section 3 adopts the analysis in Section 4.7 by reference, this technical response follows the organization of Section 4.7 as to direct and indirect impacts.

This technical response reviews DEIS Section 4.7 and provides supplemental analysis with respect to direct and indirect impacts referenced in Section 3.5 Tribal Resources and Section 6 Cumulative Impacts. As described in Section 4.7 of the DEIS and supplemental analysis provided in this document, it is appropriate to evaluate the potential for the project to directly and indirectly affect fish. However, based on a combination of restrictions on construction timing, and the low risk to individual fish, none of the potential impact mechanisms support a conclusion that the numbers of fish available to tribal fishers in Zone 6 would be reduced. Therefore, other DEIS sections (notably 3.5 and 6) are incorrect in using the analysis in Section 4.7 of the DEIS to draw conclusions of impacts on fish or, by extension, tribal fish resources.

2 POPULATIONS CONTRIBUTING TO TRIBAL FISH RESOURCES

Consistent with the approach in DEIS Section 3.5.4.2 (Tribal Resources in the Study Area), the focus of this technical response is fish resources which are available to tribal fishers in Columbia River Zone 6. As noted above in Section 1, Zone 6 is a 147mile stretch between the Bonneville Dam and McNary Dam in which commercial fishing is set aside exclusively for tribal fishers.

Specifically, the focus of this analysis is salmon and steelhead in Zone 6 (see brief section below addressing white sturgeon and Pacific and river lamprey). Per DEIS Table 3.5-2, over the last 10 years, the reported annual catch in commercial, ceremonial, and subsistence fisheries in Zone 6 of the Columbia River has been dominated by Chinook salmon (78 percent), followed by steelhead (15 percent), coho (6 percent), and white sturgeon (1 percent). As described in the DEIS (page 3.5-8) the majority of Chinook salmon harvested are summer and fall run fish (DEIS page 3.5-8).

Because Zone 6 is above Bonneville Dam, those fish harvested in Zone 6 would not include (or would include a negligible component of) the following evolutionary significant units (ESUs) (salmon)- and distinct population segments (DPSs) (steelhead):

- Lower Columbia River Chinook (threatened)
- Upper Willamette River Chinook (threatened)
- Lower Columbia River coho (threatened)
- Columbia River chum (threatened)
- Lower Columbia River steelhead (threatened)
- Upper Willamette River steelhead (threatened)

Therefore, while construction- and operations-related activities may affect fish and fish habitat used by the six ESUs/DPSs listed above, this would not affect tribal fish resources with respect to fish harvest in Zone 6.

The following ESUs/DPSs originate upstream of the Bonneville Dam, and are available to tribal fishers in Zone 6:

- Snake River fall-run Chinook (threatened)
- Snake River spring/summer run Chinook (threatened)
- Upper Columbia spring-run Chinook (endangered)
- Deschutes River summer/fall-run Chinook (not listed)
- Middle Columbia spring-run Chinook (not listed)
- Upper Columbia River summer/fall run Chinook (not listed)
- Snake River sockeye (endangered)
- Okanogan River sockeye (not listed)
- Wenatchee River sockeye (not listed)
- Snake River steelhead (threatened)
- Upper Columbia River steelhead (threatened)
- Middle Columbia River steelhead (threatened)

In addition to the twelve ESUs/DPSs that originate upstream of Bonneville Dam (listed above), tribal fish resources in Zone 6 include a number of salmon and steelhead artificial propagation (hatchery) programs in the Columbia River basin that are not considered to be part of any particular ESU (Grette Associates 2014a). Examples include the on-going coho reintroduction and/or hatchery programs on the Yakima, Wenatchee/Methow, Clearwater (Snake River), Umatilla, and Klickitat Rivers which have been established by the member tribes of the Columbia River Inter-Tribal Fish Commission (CRITFC).

The remainder of this analysis is focused on the 12 ESUs/DPSs that originate upstream of Bonneville Dam, and also applies to fish from the artificial propagation programs originating above Bonneville Dam.

White Sturgeon and Pacific and River Lamprey

Tribal fishers harvest white sturgeon in Zone 6 (1 percent of the catch). In addition, Pacific and river lamprey are captured by tribal members (no catch numbers reported in the DEIS). The following addresses those species briefly.

The white sturgeon population in Zone 6 is largely isolated from the lower Columbia River. Between 1998 and 2011, upstream passage was observed for between 22 and 133 individuals annually (Parsley et al. 2007). The current (2016) estimated abundance of 42-60 inch total length white sturgeon in the lower Columbia River is 147,100 individual fish (WDFW and ODFW 2015). Therefore, individual fish ascending Bonneville Dam would comprise less than 1/10th of one percent of the lower Columbia River fish. Based on the few adult sturgeon migrating past Bonneville Dam, construction of the proposed Project would expose a negligible number of those fish to pile driving sound. Further, the SEPA Fish Technical Report concludes that while juvenile and adult white sturgeon may be present during impact pile driving, there is generally low potential for injury or behavioral effects (page 3-18).

The SEPA Fish Technical Report (pages 2-22 and 2-23) concludes that juvenile and adult lamprey may be present in the Project area during their respective migration periods but would not be expected to hold, spawn, or rear in this area. Based on lamprey timing and proposed work windows, no juveniles and only a small proportion of adults (late returns) would potentially be exposed to dredging and impact pile driving. The SEPA Fish Technical Report addresses lamprey briefly with respect to elevated sound, concluding that impacts from pile driving would be expected to be less harmful than for salmon and other fish species because lamprey do not have swim bladders (page 3-18).

Potential impacts associated with elevated turbidity during dredging are not addressed in the DEIS for white sturgeon or Pacific and river lamprey. As with adult salmonids, no direct harm would be expected, and any behavioral effects would be so limited that they would not disrupt normal behavioral.

Predation (fish or bird) associated with permanent structures and wake stranding has not been identified as potential population-level impact mechanisms for white sturgeon or Pacific and river lamprey in the Columbia River.

Based on the separation of the populations by Bonneville Dam and the low potential for impact from the Project, the Project would not affect the population of white sturgeon available to tribal fishers in Zone 6.

Given the small proportion of adult lamprey potentially exposed to construction, and the low potential for actual effects on those individuals, the Project would not affect the population of lamprey available to tribal fishers in Zone 6 or elsewhere.

3 CONSTRUCTION IMPACTS

Section 3.5.5.1 of the DEIS generally identifies both direct and indirect effects of construction and references DEIS Section 4.7 (Fish) as well as DEIS Section 4.5 (Water Quality) for specific construction-related activities. However, both DEIS Sections 4.7 and 4.5 state that construction would not result in indirect impacts on fish or water quality, therefore this discussion only addresses the direct impacts of construction.

Section 3.5.5.1 of the DEIS concludes (combining language for direct and indirect impacts of construction):

> "In-water construction-related activities such as dredging and dock construction would cause physical or behavioral responses in fish. These activities could also affect aquatic habitat, which could reduce the number of fish surviving to adulthood and returning to areas upstream of Bonneville Dam…thereby affecting the number of fish available for harvest by the tribes…" (page 3.5-14)

Dredging and dock construction (notably impact pile driving) are the main activities referenced which could result in physical or behavioral responses, or affect aquatic habitat.

3.1 CONSTRUCTION TIMING AS A MINIMIZATION MEASURE

For dredging and impact pile driving to directly affect fish, the fish must be present during the activity. In-water construction timing is regulated by work windows that determine when in-water activities can occur and the relative exposure of the fish to the potential stress or risk.

For many years, the standard in-water work window used by the USACE in the lower Columbia River has been November 1 – February 28 (USACE 2016). This work window has been applied to all in-water activities, including pile work, dredging, material placement, and other construction. In recent years, the USACE and other regulators have begun to authorize in-water work within the period of October 1 – December 31. This shift attempts to balance work timing and animal presence among a broader group of species, including eulachon. Protection of eulachon has been a major factor leading to in-water work closures in January and February.

The in-water work windows referenced the DEIS and the SEPA Fish Technical Report are activity-specific, as illustrated in Table 1 below. These are the same in-water work windows proposed by the applicant and considered in the impact analysis submitted by the applicant (Grette Associates 2014b). These activity-specific work windows are designed to minimize impacts by more tightly regulating those activities with the greatest potential for impact to periods when the fewest sensitive life stages of the species of concern are present. They were developed considering the timing, presence, and use of the various species and the potential impacts of the different construction activities. These in-water work windows are intended to be protective while allowing time for construction.

The in-water work windows for dredging (August 1 – December 31) and impact pile driving (September 1 – December 31) are very protective of juvenile salmon and steelhead for populations originating upstream of the Bonneville Dam. Timing and habitat use for those populations is summarized in Table 2 below. This is consistent with the analysis which was

submitted by the applicant and considered in the DEIS (see SEPA Fish Technical Report page 3-10, Table 7). However, the summary provided in the SEPA Fish Technical Report focuses only on potential presence during construction. The context provided by the overview of the entire year highlights that dredging and impact pile driving are proposed during times that will avoid work during all or most of the juvenile salmon outmigration period (variable by ESU). In-water construction timing also minimizes overlap with most adult salmon and steelhead originating above Bonneville Dam (Table 2).

Table 1. Activity specific work windows proposed for the Project (gray fill)

Construction Activity	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Vibratory Pile Driving (in water)		2/28							9/1			
Impact Pile Driving (in water, on land*)									9/1			12/31
Dredging (mechanical and hydraulic)								8/1				12/31
Flow Lane Disposal								8/1				12/31
General Construction, above water	no timing restrictions											
General Construction, on land*	no timing restrictions											

* 19 trestle pile would be driven in the adjacent uplands landward of OHW. Although installation of the 19 upland trestle pile would not be subject to in-water work restrictions, MBTL proposes to install them during the same period as the in-water pile in order to make the most efficient use of construction and equipment mobilization at the site.

Table 2. Anticipated presence and habitat use for Zone 6 harvestable salmonid populations in the tidal freshwater region of Columbia River

Impact Pile Driving														9/ 1										12/ 31														
Dredging and Flow Lane Disposal								8/1																12/ 31														
			Spring			*Summer*						*Fall*									*Winter*									*Spring*									
Species, ESU/DPS if applicable	**ESA Status**	**Life Stage**	**Jun**			**Jul**			**Aug**			**Sep**			**Oct**			**Nov**			**Dec**			**Jan**			**Feb**			**Mar**			**Apr**			**May**		
			A[1]	**S**[1]	**D**[1]	**A**	**S**	**D**	**A**	**S**	**D**	**A**	**S**	**D**	**A**	**S**	**D**	**A**	**S**	**D**	**A**	**S**	**D**	**A**	**S**	**D**	**A**	**S**	**D**	**A**	**S**	**D**	**A**	**S**	**D**	**A**	**S**	**D**
Chinook salmon ESUs[4]																																						
Snake River fall-run (non-listed: Deschutes River and Upper Columbia River summer/fall-runs)	T	Adults						X			X			X			…																					
		Yrlng			X																											X			X			X
		Subyr.	…[2]	X[3]		…	X	X	…	X	X		…	…		…	…		…	…									…	X		…	X		…	X		
Snake River spring/summer-run	T	Adults			X			X			X																					…			X			X
		Yrlng			X																											X			X			X
Upper Columbia River spring-run	E	Adults																														…			X			X
		Yrlng			X																											X			X			X
Coho salmon																																						
non-ESU artificial propagation etc.[5]	n/a	Adults						…			X			X			X			X			…															
		Juv.			X			…			…			…			…															…			X			X
Sockeye salmon ESUs																																						
Snake River ESU (non-listed ESUs: Okanogan River and Lake Wenatchee)	E	Adults			X			X																														
		Juv.			X			X																												X			X
Steelhead trout DPSs																																						
Snake River	T	Adults			…			X			X			X			…																					
		Juv.			X			X			X																					X			X			X
Upper Columbia River	T	Adults			…			X			X			X			…																					
		Juv.			X			X			X																					X			X			X
Middle Columbia River	T	Adults			…			X			X			X			…																					
		Juv.			X			X			X																					X			X			X

[1] A, S, and D habitat categories: Active Channel Margin (OHW waterward to 0 ft CRD), Shallow Water (0 ft CRD to -20 ft CRD), and Deep Water (beyond -20 ft CRD)

[2] "…" denotes may be present, low abundance

[3] "X" denotes present, no relative abundance

[4] As reviewed in Grette Associates 2014a and its Appendix D, juvenile Chinook timing and habitat use in the shallow margin was largely informed by Roegner et al. (2012, 2013), and focused on mainstem sampling locations between RM 34 and RM 70 (reaches C and D in those studies). Roegner et al. 2013 formed the basis for published article Teel et al. (2014). Chinook information here is consistent with the information presented for mainstem areas in reaches C and D in Teel et al. (2014).

[5] Added to address coho originating upstream of Bonneville Dam; based on run timing (2006-2015) for juveniles and adults at Bonneville (Columbia River DART 2016).

3.2 CONSTRUCTION IMPACTS: DREDGING

Timing

Dredging is proposed for August 1 through December 31.

Based on the timing of adult and juvenile salmonids movement through the Project area, the following ESUs are not expected to be present during dredging (Table 2):

- Upper Columbia River Chinook spring-run (endangered)
- Middle Columbia River Chinook spring-run (not listed)
- Snake River sockeye (endangered)
- Okanogan River sockeye (not listed)
- Lake Wenatchee sockeye (not listed)

For those five ESUs/DPSs, there would be no direct effects of dredging.

This leaves the following seven Chinook and steelhead ESUs/DPSs to consider, in addition to fish from artificial propagation programs (including coho):

- Snake River fall-run Chinook (threatened)
- Snake River spring/summer run Chinook (threatened)
- Deschutes River summer/fall-run Chinook (not listed)
- Upper Columbia River summer/fall run Chinook (not listed)
- Snake River steelhead (threatened)
- Upper Columbia River steelhead (threatened)
- Middle Columbia River steelhead (threatened)

The August 1 through December 31 dredging period is very protective of juvenile salmon and steelhead originating upstream of Bonneville Dam (Table 2). No juvenile steelhead and no Snake River spring/summer Chinook would be expected during the dredging period. Very small numbers of juvenile coho could be present though October, but this would represent less than 5 percent of the typical outmigration (95 percent have typically migrated past Bonneville Dam by the end of June). Subyearling Chinook from the fall-run Chinook Snake River, Deschutes River, and Upper Columbia River ESUs would be emigrating in August, and may persist in very small numbers through November.

For most populations, the dredging period overlaps with a portion of the adult salmon and steelhead originating upstream of the Bonneville Dam. Migration timing for adults of most populations is expected to go through August or September, with a very small proportion of fall-run and summer/fall Chinook extending into October. Much of the dredging would occur during months when few if any adults from these populations would be present. Coho salmon are the exception, with a portion of the adult migration extending through the proposed dredging period.

Overall, most of the dredging would occur during periods when few if any juvenile salmon or steelhead would be present. Adult Chinook and steelhead may be present as late as October, but

in relatively small numbers (October), and would not be present during dredging in November and December. The vast majority of adult Chinook and steelhead would not be exposed to the potential effects of dredging.

Adult coho would be present during most of the dredging period.

Effects if Fish were Present

The following effects analysis applies only to individual fish potentially present during dredging. Specifically, it addresses the potential for physical effects of elevated suspended sediments in the water column, and also the potential for behavioral effects as a response to increased turbidity during dredging.

The DEIS states that suspended sediments concentrations near dredging activity typically do not cause gill damage to salmonids (DEIS page 4.7-23, also SEPA Fish Technical Report page 3-4). This is consistent with the impact analysis submitted by the applicant (Grette Associates 2014b). Therefore, dredging is not anticipated to injure fish present during construction.

The DEIS addresses the potential for positive and negative behavioral effects due to turbidity (DEIS page 4.7-23, also SEPA Fish Technical Report page 3-4). Examples include both increased (coho) and decreased (Chinook) predator avoidance.

It is important to understand that turbidity during dredging at this location is anticipated to be minimal, temporary, and highly localized (well within 300 feet of active dredging) and deep (greater than -20 ft CRD). This is based on the sandy sediment and is demonstrated by observations during previous dredging at Dock 1 immediately upstream (Grette Associates 2014b). Temporary avoidance of the mixing zone by individual salmonids (juvenile or adult) in deep water would not disrupt behaviors such as rearing, foraging, or migration because it is limited to a relatively small area of the Columbia River and avoidance would not exclude the opportunity for fish to use or pass through any particular habitat type. Even with the general context of minimal, temporary, and highly localized turbidity, impact analysis submitted by the applicant included an evaluation of salmonid behavioral responses to elevated levels of suspended sediments (Grette Associates 2014b), which is summarized here for reference.

Salmonid behavioral responses to elevated levels of suspended sediment can include feeding disruption, changes in migratory behavior, or swimming near the surface and avoidance behavior. Results of laboratory studies for fish exposed to turbidity and/or total suspended sediments (TSS) indicate little to no feeding disruption response at the turbidity and/or TSS anticipated within the mixing zone during dredging (Bisson and Bilby 1982, Berg and Northcote 1985, Redding et al. 1987). While some disruption has been observed at turbidity levels as low as 20 NTU (e.g., Berg and Northcote 1985), given that levels of background turbidity already may be above these lower thresholds, and that background variability is so much greater than the difference in turbidity observed at various points during active dredging, foraging disruptions resulting from dredging conditions are very unlikely. Similarly, there is some evidence that TSS and turbidity levels expected at this location during dredging (see Grette Associates 2014b) are at the low end of those levels that can cause a behavioral response in juvenile salmonids such as avoidance (e.g., Martin et al. 1977) or rising to the surface (e.g., Servizi 1988) under controlled

conditions. However, based on relative background levels and variability, the temporary and highly localized alterations from dredging may not elicit a response. Even temporary avoidance of the mixing zone on the part of individual juvenile or adult salmonids in deep water would not disrupt rearing, foraging, or migration because it is limited to a relatively small area of the Columbia River and avoidance would not exclude the opportunity for individual fish to use or pass through any particular habitat type.

The DEIS proposes that elevated turbidity "could affect" juvenile salmon and steelhead behavior, potentially including reduced predator avoidance (SEPA Fish Technical Report page 3-4). As with other effects, the vast majority of juveniles from populations potentially present during dredging would not experience increased turbidity due to timing restrictions. Based on timing restrictions and the limited extent of turbidity during dredging, only a very small proportion of emigrating juvenile salmonids could ever be exposed to turbidity.

Conclusion

Dredging would cause localized turbidity that is expected to settle quickly. Timing restrictions on dredging will largely limit the potential for adult and juvenile salmonids produced above Bonneville Dam to be exposed to turbidity. Of those fish potentially present, not all would be exposed to turbidity due to the small area of the mixing zone (300 feet from active dredging).

For the very small subset of individual fish that could experience elevated turbidity, there is no expectation of injury due to gill damage. Behavioral responses could occur, but due to the limited spatial extent of the turbidity this would not be expected to disrupt foraging, rearing, or migration to the degree to lower the fitness or survival of the exposed fish. Overall, the risk posed by turbidity to individual fish is expected to be negligible.

The low risk to individual fish could not translate to high enough mortality to cause or contribute to a population-level effect for the salmonids originating upstream of Bonneville Dam. Therefore, dredging would not impact fish harvest by tribal fishers in Zone 6.

3.3 CONSTRUCTION IMPACTS: IMPACT PILE DRIVING

Timing

Impact pile driving is proposed for September 1 through December 31. Based on the timing of adult and juvenile salmonid movement through the Project area, the following ESUs/DPSs are not expected to be present during impact pile driving (see Table 2):

- Snake River spring/summer run Chinook (threatened)
- Upper Columbia River Chinook spring-run (endangered)
- Middle Columbia River Chinook spring-run (not listed)
- Snake River sockeye (endangered)
- Okanogan River sockeye (not listed)
- Lake Wenatchee sockeye (not listed)

For these six ESUs/DPSs, there would be no direct effects of impact pile driving.

This leaves the following six Chinook and steelhead ESUs/DPSs to consider, in addition to fish from artificial propagation programs (including coho):

- Snake River spring/summer run Chinook (threatened)
- Deschutes River summer/fall-run Chinook (not listed)
- Upper Columbia River summer/fall run Chinook (not listed)
- Snake River steelhead (threatened)
- Upper Columbia River steelhead (threatened)
- Middle Columbia River steelhead (threatened)

The list above is consistent with DEIS Table 4.7.7 (page 4.7-25), but also includes the non-listed Chinook ESUs (included in Table 2 of this technical response). This information is consistent with the impact analysis submitted by the applicant (Grette Associates 2014b).

The September 1 through December 31 impact pile driving period is very protective of juvenile salmon and steelhead originating upstream of the Bonneville Dam (Table 2); even more so than the dredging period because it avoids work during August when subyearling fall-run Chinook are expected to be present. Further, no juvenile steelhead would be expected during the impact pile driving period. Very small numbers of juvenile coho could be present though October, but this would represent less than 5 percent of the typical outmigration (95 percent have typically migrated past Bonneville Dam by the end of June). Similarly, very small numbers of subyearling Chinook from the fall-run Snake River, Deschutes River, and Upper Columbia River ESUs may persist through November.

For most populations, the impact pile driving period is also protective of adult salmon and steelhead originating upstream of Bonneville Dam. Return migration timing for most populations is expected to extend into August or September, with a very small proportion of fall-run and summer/fall Chinook extending into October. Much of the impact pile driving would occur during months when few if any adults from these populations would be present. Coho salmon are the exception, with returns extending well into the proposed impact pile driving period.

Overall, impact pile driving would occur when few if any juvenile salmon and steelhead are present. Adult Chinook and steelhead may be present as late as October, in relatively small numbers (October), and the vast majority of individual fish would not be exposed to pile driving. Adult coho are the exception and would be present during much of the impact pile driving period.

Effects if Fish were Present

The discussion above establishes that an impact pile driving work window will avoid direct effects dredging for six populations of salmon and steelhead originating above the Bonneville Dam. For those fish potentially present, excepting adult coho, the vast majority of individual fish move through the Project area outside of the impact pile driving period and therefore would not be exposed to pile driving.

The following effects analysis therefore applies only to those fish present during impact pile driving. It addresses the potential for physical effects of elevated underwater sound pressure levels, and also the potential for behavioral effects as a response to elevated underwater sound.

The DEIS analysis of direct effects of impact pile driving on juvenile and adult salmon and steelhead is generally consistent with the impact analysis submitted by the applicant (Grette Associates 2014b). The DEIS analysis concluded no unavoidable and significant adverse impacts for fish.

Individual subyearling Chinook and juvenile coho in the system during impact pile driving would be a very small proportion of emigrants in any given year. As described in the SEPA Fish Technical Report, the pile driving impact analysis is conservative with regard to the potential for injury (page 3-8) or behavioral effects (page 3-14). As part of ESA consultation for the Proposed Action it is expected that pile driving would be concluded to cause a small but unquantified "take" or loss of juvenile salmonids. Such a conclusion would be consistent with the conclusions for a number of other ESA consultations for larger projects on the lower Columbia River including:

- Port of Kalama North Port Marine Terminal Expansion (NMFS 2005)
- Port of Kalama United Harvest Pier Modernization (NMFS 2010)
- Columbia River Crossing (NMFS 2011a)
- Port of Vancouver Terminal 5 Bulk Potash Handling Facility Project (NMFS 2012)

As described in NMFS' conclusions for two of these consultations, "*the removal of a small number of juveniles from these populations [for which injury/mortality from pile driving is likely to occur] is not expected to affect the number of adults that will return to spawn, or the distribution or productivity of spawners… Thus, the proposed actions are not expected to affect the abundance, productivity, distribution, or diversity of any affected population and will not appreciably reduce the likelihood of survival and recovery for these species*" (NMFS 2010 and NMFS 2012). These consultations concluded that individual effects for these projects would not have population-level impacts (e.g., abundance, productivity).

The numbers of individual juvenile salmonids that could be lost due to pile driving is so small it would not change the number of adult fish returning to Zone 6.

Adult Chinook and steelhead would be present during September and could be present into October, comprising the late portion of returning fish for the six ESUs/DPSs considered. Adult coho originating from above the Bonneville Dam would be present throughout the impact pile driving period. All adult salmon and steelhead are expected to be migrating rapidly past the construction area (DEIS page 4.7-26), limiting their potential for and duration of exposure to elevated sound.

The SEPA Fish Technical Report concludes that it is extremely unlikely that individual adult fish present during impact pile driving would be injured due to elevated sound (page 3-14); behavioral effects are speculative (page 3-14 and 3-15). Based on the information in the SEPA

Fish Technical Report and our own analysis, the direct effects of impact pile driving on individual adult fish would be negligible (injury) or minimal (behavioral).

Conclusion

Overall, the timing restrictions during impact pile driving will limit the exposure of adult and/or juvenile salmonids originating above Bonneville Dam. Six ESUs will experience *no direct effects* of impact pile driving. Adult and/or juvenile salmonids from the remaining six ESUs/DPSs listed above, as well as other hatchery-origin salmonids, could be present during impact pile driving. As described above, for those populations, effects would either affect a very small proportion of individual emigrating subyearling (Chinook and coho) or would be negligible and/or minimal for individual returning adults (Chinook, steelhead, and coho). These effects on individual fish are not commensurate with population level effects for any of the populations originating from upstream of Bonneville Dam. Therefore, the direct effects of impact pile driving would not affect fish harvest for tribal fishers in Zone 6.

4 OPERATIONS IMPACTS

Chapter 4 of the DEIS addressed nine categories of potential direct and indirect impacts to fish that could result from the operation of the proposed Coal Export Terminal.

For the following seven categories, risks were speculated but strong conclusions were not drawn in terms of impacts to fish. Because risks for these categories were either determined or implied to be insignificant or were speculative at the level of individual fish and fish habitat, those analyses do not support conclusions of population-level impacts to fish originating upstream of Bonneville Dam:

- Cause Spills or Leaks that Contaminate Water Quality
- Cause Physical or Behavioral Response to Vessel Noise
- Generate and Disperse Coal Dust in the Aquatic Environment
- Spill Coal during Operations of the Proposed Action
- Periodically Remove or Alter Aquatic Habitat during Maintenance Dredging
- Spill Coal during Rail Transport
- Affect Commercial and Recreational Fishing

For the remaining two categories listed below, the DEIS identified potential appropriate impact mechanisms that warranted additional analysis relative to individual and population-level impacts.

- Increased Shading that Affects Fish and Fish Habitat
- Cause Fish Stranding from Vessel Wakes

4.1 OPERATIONS – DIRECT IMPACTS

4.1.1 Increased Shading that Affects Fish and Fish Habitat

The following conclusions are from page 4.7-28 of the DEIS:

"The height of the trestle would allow light to penetrate beneath the structure and would, therefore, not be expected to have measurable shading effects on primary productivity or fish behavior, migration, or predation in SWZ habitat."

"Based on the location of Docks 2 and 3 over DWZ habitat, and the relatively small area shaded in relation to the overall study area, the overall shading impact would be low."

Due to the determinations of no measurable and low potential impacts, no additional analysis is provided in the DEIS on these points. However, the DEIS does assume an increase in predation that would likely impact fish present in the Project Area. The DEIS concludes the following on page 4.7-28:

"The dock and moored vessels would be located over DWZ habitats, where shaded habitat could provide suitable conditions for larger predatory fishes and piscivorous birds (i.e., fish-eating) birds. Piles and moored vessels may also create flow conditions favorable for predatory

birds. The extent or magnitude to which an increase in overwater surface area could alter the predator-prey relationship in the study area is unknown, but it is assumed that the relationship would change and an increase in predation would be likely. "

The key issues for understanding whether these impacts can cause or contribute to a population level impact on fish is understanding the distribution and effect of predators in the river below Bonneville Dam. Piscivorous fish and birds are addressed separately below.

Piscivorous Fish

Docks 2 and 3 would be located approximately 700 feet offshore in deep water as measured perpendicular to shore. This would comprise most of the new structure including 563 of the new piling to be placed below OHW (93 percent of total) and 4.62 acres of the new overwater coverage (90 percent of total). Most of this structure would be supported by bents approximately 78 feet long (perpendicular to shore) spaced 15 feet apart, and alternating between 2 and 5 pile per bent. A portion of Dock 2 would consist of 6 bents 98 to 118 feet long spaced 20 feet apart supported by 6 or 7 pile each. Overall, pile spacing would vary between 15 and 30 feet between bents, and up to 60 feet within a bent. After dredging, most of Dock 2 and 3 would be located waterward of -40 ft CRD.

At its widest point the structure would be approximately 127 feet wide, which is about 5 percent of the channel width at the Project site; the majority of the structure is approximately 90 feet wide. Therefore, while there may be increased potential for piscivorous fish associated with the structure of Docks 2 and 3, a relatively small proportion of fish are expected to encounter this structure based on its depth and orientation relative to the channel.

Piscivorous Birds

In the context of Columbia River salmonid recovery planning, avian predation is not addressed specifically relative to overwater structures; however, it is addressed relative to pile, pile dikes, and other non-specific structures (NMFS 2011b). In the Columbia River, pile and pile dikes are repeatedly, specifically cited as bird roosting areas with regard to predation on juvenile salmonids whereas large overwater structures are not (Lyons, Roby, and Collis 2007; Lower Columbia River Fish Recovery Board 2010, NMFS 2011b).

In recent years, Caspian terns and double-crested cormorants (hereafter "terns" and "cormorants") nesting on East Sand Island consumed approximately 4.7 million and 11 million juvenile salmonids, respectively, per year (USACE 2014a, USACE 2014b). The diet of terns which nest on East Sand Island typically includes approximately 31 percent salmonids, on average, with the remainder primarily marine forage fishes (USACE 2014b). The diet of East Sand Island cormorants includes approximately 12 percent salmonids, on average, with the remainder constituting a wide variety of marine, estuarine, and freshwater taxa (USACE 2014a). The proportion of salmonids in the diet of these birds fluctuates with availability; peak salmonid consumption occurred in mid- and late-May for terns and cormorants, respectively (USACE 2014a, USACE 2014b). Based on colony size, it could be expected that predation on juvenile salmonids by terns and cormorants in the estuary is primarily associated with birds nesting on East Sand Island. This is consistent with the recovery of passive integrated transponder (PIT)

tags from nesting areas throughout the Columbia Basin, which revealed that terns and cormorants from East Sand Island consumed the highest proportion of PIT-tagged salmonids in comparison to all other colonies (Evans et al. 2012).

Cormorants nesting on East Sand Island were found to travel an average of 3 to 10 miles to forage (Anderson et al. 2004). Females generally traveled less than 6 miles from the colony while the majority of males traveled more than 9 miles but less than 15 miles; the two farthest foraging trips performed by males were approximately 26 and 29 miles. Terns nesting at East Sand Island forage primarily in the vicinity of their colony and only occasionally travel into the freshwater zone of the upper estuary (Lyons et al. 2005). The Project is located at RM 63, which is approximately 58 miles upstream of East Sand Island. Based on the foraging distances identified above, the majority of terns and cormorants nesting on East Sand Island (RM 5) would not be expected to forage above RM 34 and would thus not be expected to occur in the Project area. The majority of cormorants nesting near Miller Sands Spit and the upper estuary channel markers (~RM 23 to 33) would also be unlikely to forage in the Project area, as this would represent trips of 40 and 30 miles, which is at the farthest extent of the foraging range for males described by Anderson et al. (2004). Overall, the Project area is not expected to be utilized as a foraging area by cormorants or terns from the East Sand Island colonies or by cormorants from other smaller colonies in the lower estuary.

In addition to the low likelihood that cormorants or terns would forage in the Project area, the terminal is unlikely to provide suitable roosting habitat. Docks 2 and 3 and the associated trestle would constitute a busy, industrial terminal with 24-hour operations. This activity is likely to dissuade birds from regularly perching on structures at the facility. Therefore, new structures associated with the proposed terminal would not be expected to increase the presence of piscivorous birds at the Project site.

Conclusions on Population-level Impacts due to Predators

Recent studies have assessed mortality of juvenile salmonids migrating in the Lower Columbia River downstream of Bonneville Dam by using fish tagged with acoustic transmitters and fixed antennae arrays (McMichael et al. 2010, McMichael et al. 2011). The fish studied are salmon and steelhead stocks that are produced upstream of Bonneville Dam and would contribute to tribal fisheries in Zone 6.

These studies provide data on overall mortality experienced by juvenile salmonids as they emigrate through the lower river and allow partitioning of mortality to the reach of the river that mortality occurs. Survival from the dam to the mouth of the river varies by species, life history type, migration season and year. In 2010 the pooled survival probability was measured from just downstream of the mouth of Willamette River RKm 153 (RM 95), to the mouth of the Columbia River. Survival probability was 0.844 for yearling chinook, 0.603 for steelhead smolts, and 0.861 for subyearling fingerling Chinook[1]. These results fall within the range of results that have been measured previously for fish migrating from the dam to the mouth (McMichael et al. 2010,

[1] Fish were tagged and released at multiple locations above the Bonneville Dam, but survival probability was calculated based on "virtual releases" comprising tagged fish detected at RKm 153 (~RM 95), just downstream of the Willamette River. See McMichael et al. 2011, Section 2.1 (Fish Collection, Tagging, Release) and Section 2.8 (Migration Behavior).

McMichael et al. 2011). Figures 1, 2, and 3 show the results for Chinook yearling, Steelhead smolts, Chinook subyearling (fingerlings) passing through the lower Columbia River. Most of the mortality occurs below RKm 50 (~RM 31.5) with losses typically highest below RKm 37 (~RM 23). This zone of the Columbia River coincides with the location of the Caspian tern and cormorant colonies and the mortality that occurs in this area is typically concluded to be caused by bird predation (McMichael et al. 2011)[2]. The level of the mortality occurring downstream of RKm 50 (~RM 31.5) is consistent with an impact that would cause population-level losses that would affect the numbers of returning adult salmon to the Zone 6 fishery.

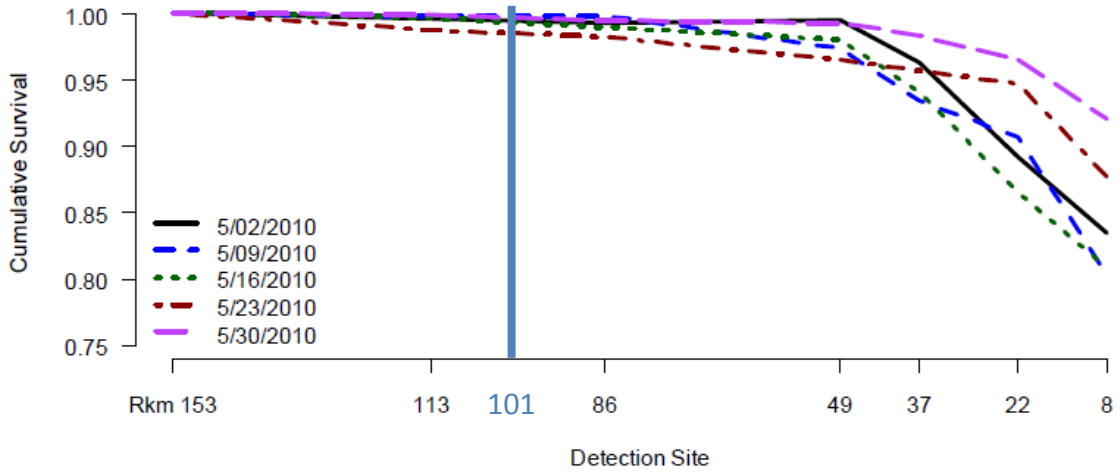


Figure 1. Yearling Chinook cumulative survival probability, adapted from McMichael et al. 2011, with Coal Export Terminal location shown (~RKm 101). Note differences in Y-axis scale among Figures 1, 2, and 3.

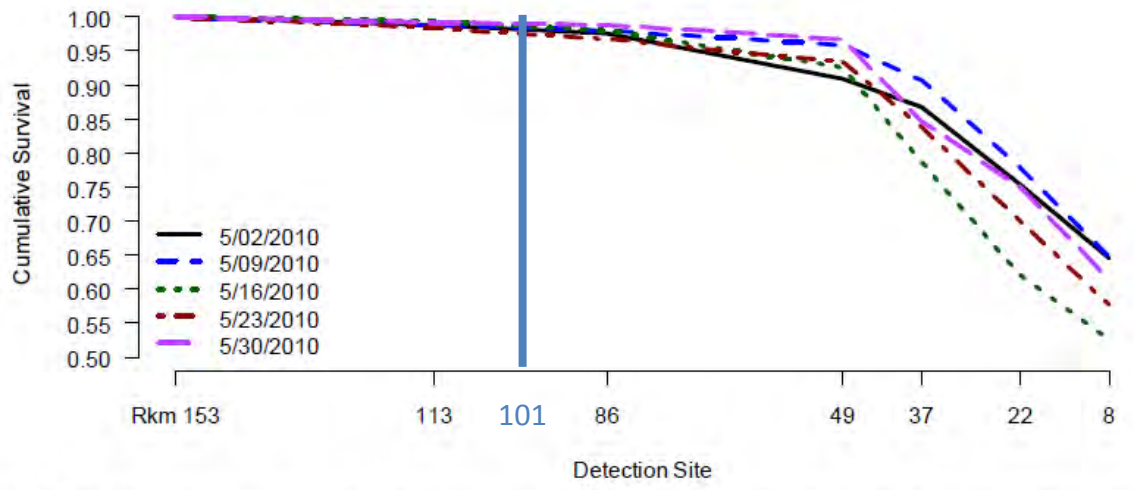


Figure 2. Steelhead smolt cumulative survival probability, adapted from McMichael et al. 2011, with Coal Export Terminal location shown (~RKm 101). Note differences in Y-axis scale among Figures 1, 2, and 3.

[2] The authors note that apparent decreased survival for the latest virtual release group of subyearling Chinook could result from individual fish ceasing migration in favor of extended rearing, rather than individual mortality (Figure 3; page 4.1 in McMichael et al. 2011).

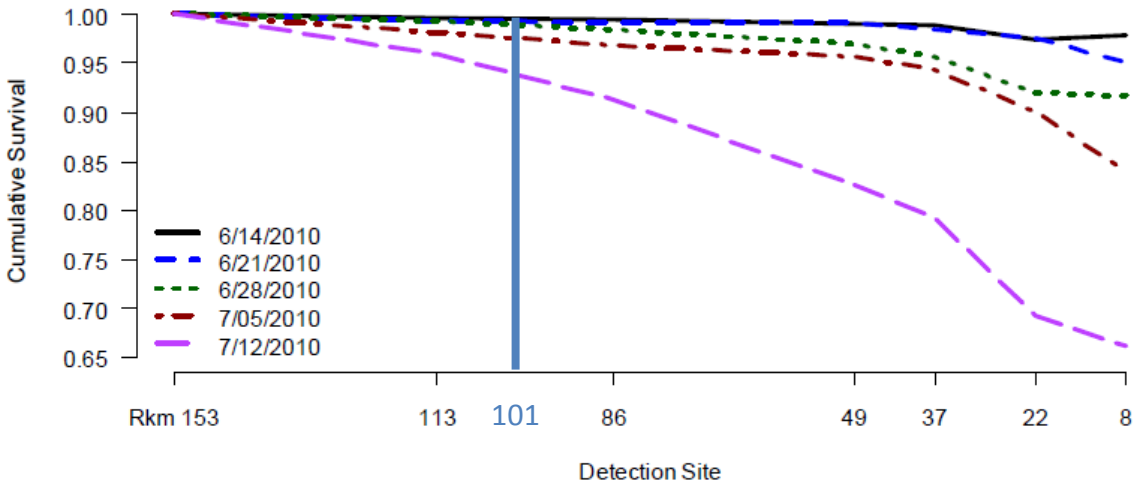


Figure 3. Subyearling Chinook cumulative survival probability, adapted from McMichael et al. 2011, with Coal Export Terminal shown (~RKm 101). Note differences in Y-axis scale among Figures 1, 2, and 3.

Based on the result in Figures 1, 2, and 3, very little mortality is occurring to migratory juvenile salmonids from near the mouth of the Willamette River to RKm 50 (~RM 31.5) from all causes. Further, the developed shorelines of Longview, Washington and Rainier, Oregon, with their numerous large overwater structures and pilings, are encompassed by the reach of the river described between RKM 113 (~RM 70) and RKm 86.2 (~RM 53.6). The results demonstrate that that survival is high through that developed reach (Figures 1, 2, and 3). Based on the analysis above, the potential for the new docks to cause a change in predation, by birds or fish, in the reach from RM 70 to Rm 53.6 is negligible and would not contribute to the population- level impacts of predation experienced below RKm 50 (~RM 31.5).

These conclusions are consistent with the low importance put on overwater structures in the Columbia River Estuary ESA Recovery Plan Module for Salmon and Steelhead (NMFS 2011b). Specifically, predation impacts associated with overwater structures has been identified as a relatively low risk with a very low threat priority (NMFS 2011b).

4.2 OPERATIONS – INDIRECT IMPACTS

4.2.1 Cause Fish Stranding from Vessel Wakes

The following conclusion is from Page 4.7-32 of the DEIS

"The additional traffic associated with the Proposed Action would result in an increased risk of fish stranding."

Field studies have demonstrated that in order for subyearling Chinook salmon to be exposed to stranding, they must be present in the shallow water margin when ship wakes interact with the shoreline (Bauersfeld 1977, Hinton and Emmett 1994, Pearson et al. 2006). The distribution of subyearling Chinook salmon in the shallow margin varies seasonally, with differences in water

temperature, river level, and fish length all influencing habitat preferences (McCabe et al. 1986, Dawley et al. 1986, Healy 1991, Bottom et al. 2005, Bottom et al. 2008).

In general, habitat use and timing of Chinook salmon outmigration periods vary by age group. Most yearling fish emigrate in the spring, during which time they utilize deepwater areas. In addition, subyearling emigrants from the Snake River fall-run ESU are typically larger than other subyearlings (>99 mm), and like yearling fish are most likely to use deepwater areas. Unlike yearling fish, Snake River fall-run Chinook salmon emigrate over a longer period, which extends from the spring through the fall (see Table 2 in Section 3.1).

Small subyearling chinook use shallower water areas closer to shore. Collectively, subyearlings from several ESUs could be present in the lower Columbia year round, and in general their habitat use shifts from the very shallow margins to shallow water and eventually to deep water areas as fish size increases throughout the outmigration period.

Roegner et al. (2012, 2013) collected subyearling Chinook salmon with beach seines at sites throughout the lower Columbia River. For the purpose of considering stranding risk, this analysis focuses on results downstream from RM 63. This includes study sites from reaches C and D of Roegner et al. 2013 and the tidal freshwater sites in Roegner et al. 2012. These studies provide data between roughly RM 34 and 70 (Figure 4).

The authors performed genetic-stock analyses to assign subyearling fish to their ESU of origin[3] and to determine the proportional presence of each ESU in the nearshore by month/season (Table 3). Six of the eight Columbia Basin ESUs were represented in captured subyearlings, four of which are listed as threatened under the ESA. In reaches C and D, genetic stock analyses indicate that in all seasons, fall-run Chinook salmon from the Lower Columbia River ESU make up the vast majority (greater than 91 percent) of all Chinook salmon present in shallow water areas of the tidal freshwater region (Figure 5).

For most juvenile Chinook salmon, travel through the tidal freshwater region to the lower estuary is direct, on the order of days or weeks. Variations in migration rates are related, in part, to size (a function of swimming ability) and season (a function of river discharge). In addition, both yearling and subyearling Chinook salmon may extend their emigration by loitering within off-channel habitats, although occupation of these areas is typically brief (one to two tidal cycles). Overall, juvenile Chinook salmon generally move through the tidal freshwater region and do not hold or occupy areas within it for extended periods.

In summary, subyearling Chinook salmon can occur within the tidal freshwater region year-round, but presence in the shallow margin is limited largely to the spring, with low relative abundance in the winter and summer. Based on genetic-stock analyses, the majority of

[3] Roegner et al. 2012, 2013, and Teel et al. 2014 use different terminology for ESUs than those considered under the ESA. In ESA parlance, "Lower Columbia River Chinook ESU" includes the Roegner et al. categories "West Cascade Tributaries fall, West Cascade Tributary spring, and Spring Creek group fall". For this stranding analysis, this ESU divided only by fall and spring life history types. The Roegner categories also combine the Middle Columbia (not listed) and Upper Columbia (listed) spring-run ESUs, which were detected very rarely. Other minor differences in terminology exist – this analysis uses the ESU names as described by NOAA Fisheries for ESA management and recovery purposes as described on the NOAA Fisheries website http://www.westcoast.fisheries.noaa.gov/protected_species/salmon_steelhead/salmon_and_steelhead_listings/salmon_and_steelhead_listings.html.

subyearling Chinook salmon present in the shallow nearshore during all seasons originate from the Lower Columbia River ESU, and of those, the majority represent fall-run stocks (Figure 5).

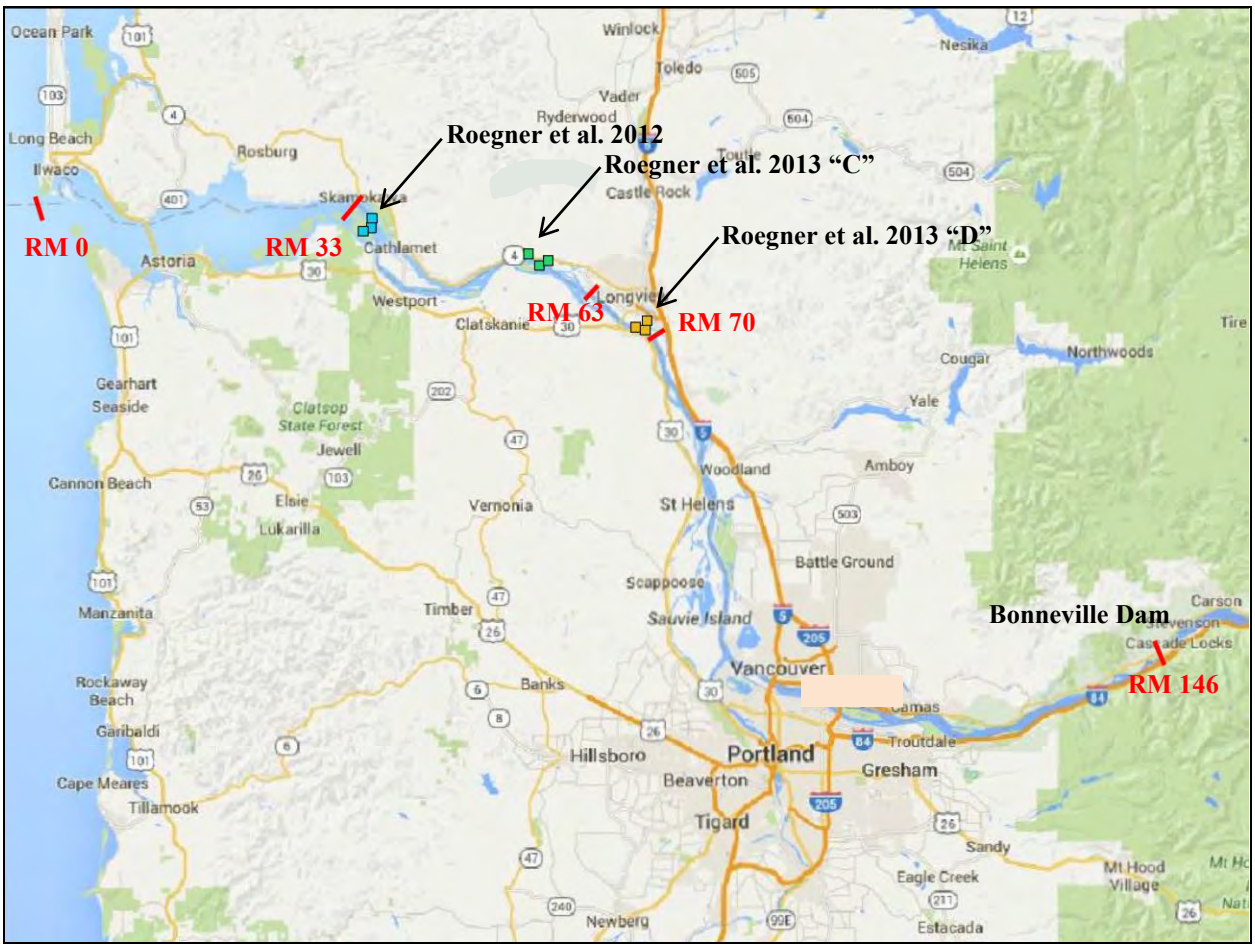


Figure 4. The subset of sampling sites of Roegner et al. (2012, 2013) that were located between RM 33 and 70 of the Columbia River

Table 3. Genetic-stock composition of subyearling Chinook salmon captured in the lower portion of the tidal freshwater region of the Columbia River estuary by month (gray shading, Roegner et al. 2013) and season (no shading, Roegner et al. 2012), between approximately RM 33 and 70 (see Figure 5). ESU names in bold font denote listing as threatened or endangered under the ESA. Composition in catch listed as '<0.01' represents a reported value of 0.005 to 0.009; reported values less than 0.004 are listed as '0.'

	Month/ Season	January[3]	Winter[4]	March		May		Spring[4]	July		Sept/Nov		Summer/Fall[4]
	Sampling Location	Reach 'C'+'D'	Tidal freshwater	Reach 'C'	Reach 'D'	Reach 'C'	Reach 'D'	Tidal freshwater	Reach 'C'	Reach 'D'	Reach 'C'	Reach 'D'	Tidal freshwater
ESU[6] (run component)	**n=fry[5] n=fingerling[5]**	***n=102 n=0***	***n=83 n=0***	***n=81 n=0***	***n=198 n=0***	***n=135 n=33***	***n=138 n=42***	***n=218 n=318***	***n=25 n=103***	***n=58 n=122***	***n=0 n=76***	***n=0 n=56***	***n=57 n=291***
Lower Columbia (fall[1])	fry	0.60	0.87	0.95	0.95	0.94	0.95	0.95	0.93	0.89	--	--	1.00
	fingerling	--	--	--	--	0.94	0.96	0.95	0.83	0.95	0.93	0.94	0.89
Lower Columbia (spring[1])	fry	0.39	0.12	0.05	0.03	<0.01	0.02	0.02	0.04	0.05	--	--	0
	fingerling	--	--	--	--	0.06	0.04	<0.01	0.05	<0.01	0.04	0.03	0.02
Upper Willamette	fry	0.01	<0.01	0	<0.01	0.02	<0.01	0	0	0	--	--	0
	fingerling	--	--	--	--	0	0	0	0	0	0.01	0.02	0
Deschutes River summer/fall-run	fry	0	0	0	0	0	0	0	0	0	--	--	0
	fingerling		--	--	--	0	0	0	0	0.02	0	0	0
Middle and **Upper Columbia spring-run[2]**	fry	0	0	0	0	0	0	0	0	0	--	--	0
	fingerling	--	--	--	--	0	0	0	0	0	0	0	0
Upper Columbia summer/fall-run	fry	0	0	0	0.01	0	0.02	0.01	0	0.03	--	--	0
	fingerling	--	--	--	--	0	0	0.03	0.11	0.02	0	0.02	0.08
Snake River fall-run	fry	0	0	0	0	0	0	<0.01	0.04	0.02	--	--	0
	fingerling	--	--	--	--	0	0	0	0	0	0	0	0.02
Snake River spring/summer-run	fry	0	0	0	0	0	0	0	0	0	--	--	0
	fingerling	--	--	--	--	0	0	0	0	0	0	0	0

[1] Lower Columbia fall-run and Lower Columbia spring-run represent the same ESU.

[2] Stocks from the Middle Columbia and Upper Columbia spring-runs represent two distinct ESUs but were not genetically differentiated. Only fish from the Upper Columbia ESU are listed as threatened under the ESA. Neither ESU was represented in beach seine catches in Roegner et al. (2012, 2013) between RM 33 and 70.

[3] Roegner et al. (2013) combined sampling from sites in reach C and D to determine the fry proportion for January.

[4] Roegner et al. (2012) defined seasons as: November–February = 'Winter'; March–June = 'Spring'; July–October = 'Summer/Fall'

[5] Roegner et al. (2012, 2013) defined the size threshold between fry and fingerling as 60 mm (FL) for subyearling fish.

[6] This table and visualization in Figure 5, exclude catches that were reported from non-ESA listed populations outside of the Columbia River (Rogue River, coast fall-spring fish), which were a very small catch component (not more than 4 percent).

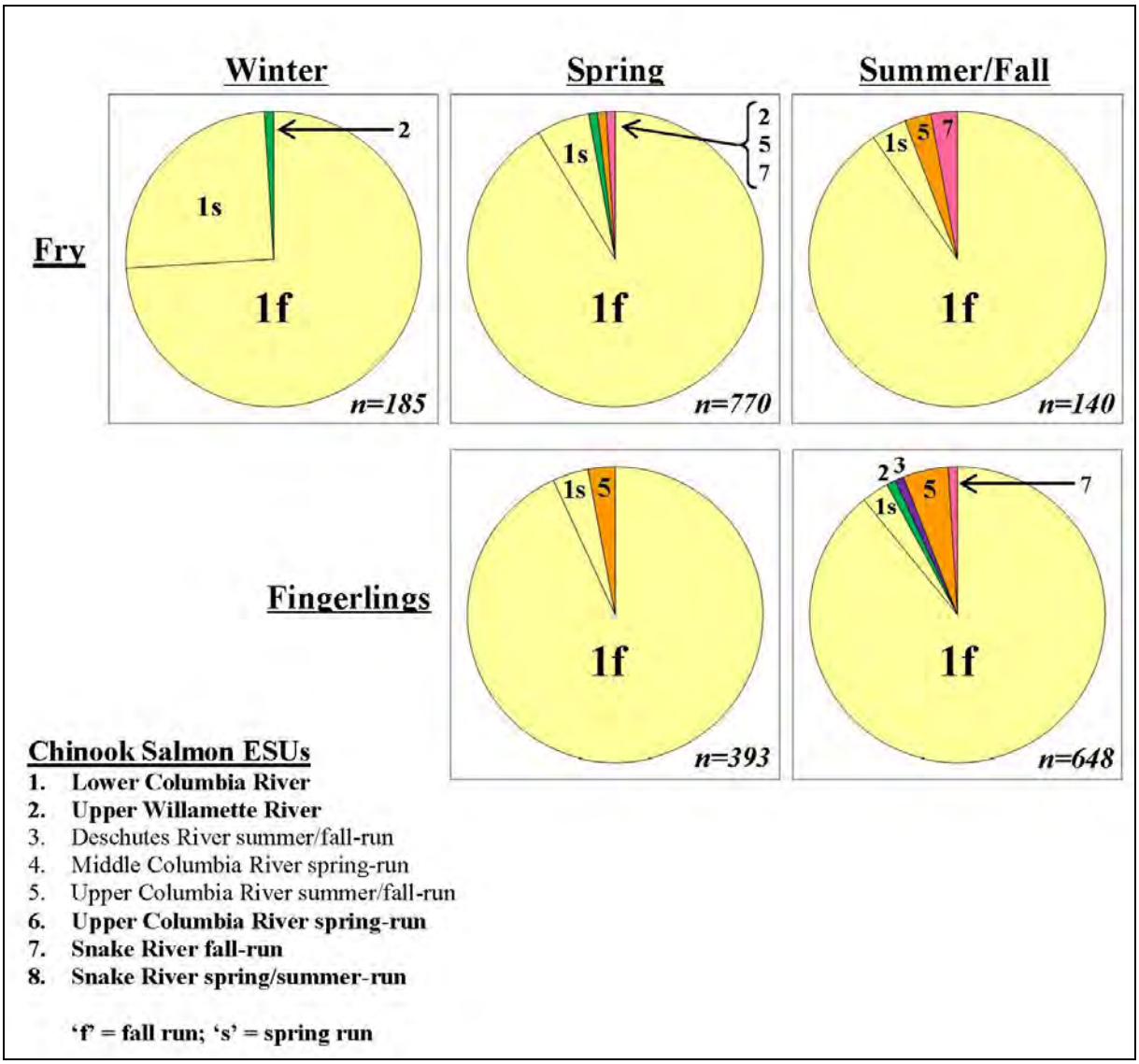


Figure 5. Spatiotemporal distributions, by ESU, of Chinook salmon fry and fingerlings captured at sites in the lower portion of the tidal freshwater region of the Columbia River estuary, between approximately RM 34 and 70 (data from Roegner et al. 2012, 2013). Chinook salmon ESU names in bold font denote listing as threatened or endangered under the ESA.

Stranding Susceptibility by ESU

Bottom et al. (2008) found that the presence of subyearling Chinook salmon in nearshore areas declined in July, once surface-water temperatures at sampling sites exceeded 19°C. The authors concluded that high temperatures reduced the availability of shallow-water habitat by mid-summer and shifted occupation to deepwater areas during the late-summer and fall. A shift away from the shallow margin to deeper habitat is also associated with the attainment of fingerling size. This has been observed during concurrent sampling where subyearling Chinook salmon occupying shallow-water areas were generally smaller than those subyearlings captured from adjacent deepwater channels (Dawley et al. 1986, McCabe et al. 1986, Weitkamp et al. 2012).

Additionally, fish length influences habitat preference by season. In the winter and early spring, mean length is typically consistent with fry (<60 mm), in spring and summer it is more typically consistent with small fingerlings (60 to 80 mm), and in the fall it is more typically consistent with larger fingerlings (80 to 120 mm) (Bottom et al. 2008, Johnson et al. 2011). Fish length influences habitat associations and outmigration pathways, with small fry and fingerlings occupying shallow margin areas and larger fish moving through deepwater channels (Dawley et al. 1986, McCabe et al. 1986, Bottom et al. 2008, Roegner et al. 2012, Roegner et al. 2013, Weitkamp et al. 2012). For instance, McCabe et al. (1986) determined that this habitat transition occurred when fish approached 99 mm. Based on the above discussion, a summary of expected presence in the different habitat zones between RM 34 and 61, by ESU, is included in Table 4. The river extent is based on the lower- and upper-most beach seine locations within Reaches C and D, which represent the tidal freshwater portion of the river below RM 63.

Table 4. Summary of expected presence in the different habitat zones between RM 33 and 63 of the tidal freshwater region for juvenile Chinook salmon from all Columbia River ESUs.

		Expected Presence[1]							
		Winter[2]		Spring[2]		Summer[2]		Fall[2]	
ESU (outmigrant age class)	**ESA Listing Status**	Shallower [3]	Deeper[3]	Shallower	Deeper	Shallower	Deeper	Shallower	Deeper
Lower Columbia River (subyearling and yearling)	Threatened	…[5]	….	X	X	…	X		…
Upper Willamette River (subyearling and yearling)	Threatened	…[6]	…	…	X				…
Deschutes River summer/fall-run (subyearling)[6]	Not Listed			…	X	…	X		…
Middle Columbia River spring-run (yearling)[6]	Not Listed				X				
Upper Columbia River summer/fall-run (subyearling and yearling)[7]	Not Listed			…	X	…	X		…
Upper Columbia River spring-run (yearling)	Endangered				X				
Snake River fall-run (subyearling and yearling)	Threatened			…	X	…	X		…
Snake River spring/summer-run (yearling)	Threatened				X				

[1] Information referenced from Roegner et al. (2012, 2013), Columbia River DART (2013), and Bottom et al (2008)

[2] Seasons are based on Roegner et al. (2012, 2013): December–February = 'Winter'; March–June = 'Spring'; July –August = 'Summer'; and September–November = 'Fall'

[3] Refers generally to shallow, nearshore water, e.g. 0-6 ft depth.

[4] Refers generally to deeper water, e.g. 6 ft and deeper.

[5] The use of '…' denotes low relative abundance within each ESU, X denotes higher relative abundance more typical of standard outmigration periods.

[6] Localized presence is higher in the Shallow water near and immediately downstream of the mouth of the Willamette River, but not generally within the tidal freshwater region.

Conclusions

Subyearling Chinook salmon documented in stranding events have been limited to those of fry and fingerling size, typically between 30 and 90 mm (Bauersfeld 1977, Hinton and Emmett 1995, Ackerman 2002, Pearson et al. 2006). This size range is consistent with those fish which have a strong association to shallow nearshore areas (see Table 4). Based on genetic-stock analyses from the shallow nearshore (Figure 5) and seasonal expectations for presence in the habitat zones (Table 4), exposure to stranding risk is expected to primarily concern small subyearlings from fall-run stocks of the Lower Columbia River ESU during the winter, spring, and early summer. All other ESUs are expected to be at very low risk of stranding due to vessel wakes from ships calling at the proposed Coal Export Terminal due to their near absence from the shallow water margin during seasons when stranding occurs. As described above,

subyearling outmigrants from the Snake River fall-run ESU are typically larger than other subyearlings (>99 mm), and like yearling fish are most likely to use deepwater areas.

As stated in Section 3.2 of this technical response, the Lower Columbia River Chinook ESU does not contribute to tribal fisheries in Zone 6. Therefore, wake stranding is not an important impact mechanism for evaluating population-level impacts on salmonid runs that support tribal fisheries in Zone 6.

5 SUMMARY AND CONCLUSION ON POPULATION-LEVEL EFFECTS

Section 4.7 of the DEIS did not identify any construction or operational aspect of the Proposed Action that would yield significant unavoidable adverse impacts on fish. However, DEIS Section 3.5 references the analysis in Section 4.7 to state that some construction- and operations-related direct and indirect effects could reduce the number of fish surviving to adulthood and returning to areas upstream of Bonneville Dam, thereby affecting the number of fish available for harvest by tribal fishers. Section 3.5.8 of the DEIS draws the same conclusions, implying unavoidable and significant impacts to tribal fisheries in Zone 6. This is not supported by the analysis in Section 4.7.

The analysis in DEIS Section 4.7 speculated that impacts could occur to fish. The supplemental analysis presented above identified only two impact mechanisms with a likelihood of causing injury or mortality to juvenile salmonids: impact pile driving (construction) and wake stranding (operations). Neither of these mechanisms is likely to cause mortality to adult fish.

Impact pile driving has the potential to injure or affect the behavior of only a very small number of juvenile fish due to in-water work timing restrictions the protective nature of the timing restrictions, and the low risk posed by pile driving. Based on the minor impacts, pile driving would not affect the adult population, and would not affect fish resources available to tribal fishers in Zone 6.

Further, wake stranding does not present a pathway by which tribal fisheries in Zone 6 could be affected by the project. This is based on beach seining and DNA data which shows that the ESU of salmon present in the shallow water margins and thereby vulnerable to wake stranding (Lower Columbia River Chinook) do not originate above Bonneville Dam and are not part of the tribal fishery.

Based on the conclusions presented in Section 4.7 of the DEIS and analysis presented above, the Proposed Action would not adversely impact tribal fisheries in Zone 6.

In the methods section for cumulative impacts, the DEIS states on Page 6-2

"If the Proposed Action would not result in adverse impacts in a particular resource area, then it would not have the potential to contribute to cumulative impacts in that resource area and no cumulative analysis for the resource area is warranted."

Based on the DEIS approach to cumulative impacts and the lack of impacts on tribal fisheries in Zone 6, the DEIS should have concluded the Proposed Action "would not have the potential to contribute to cumulative impacts". Instead Section 6.3.1.5 of the DEIS concluded on Page 6-22 and 6-23:

"Operation of the Proposed Action would also affect tribal resources through activities that cause physical or behavioral responses in fish or that affect aquatic habitat. These impacts could reduce the number of fish available for harvest by the tribes in the areas upstream of Bonneville Dam."

"Cumulative projects would also introduce vessel traffic and other activities that may cause physical or behavioral responses in fish or affect aquatic habitat. Therefore, the Proposed Action, in combination with the cumulative projects, would contribute to cumulative impacts on tribal fish resources."

Based on the lack of impacts on tribal fisheries presented in Section 4.7 of the DEIS and the analysis presented herein, it is incorrect and speculative to conclude the Proposed Action contributes to cumulative impacts affecting the populations of salmonids harvested by tribal fishers in Zone 6.

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ATTACHMENT 4 – GREENHOUSE GAS TECHNICAL REPORTS AND MEMORANDA

1. **Evaluation of the Statistical Confidence Level of the Draft EIS GHG Forecast Analysis, June 2016, Navigant**
2. **Evaluation of Draft EIS Assumed Induced Demand for Coal in the Pacific Basin Based on an Elasticity of Demand Assumption, June 2016, Navigant**
3. **Heat Content of Indonesia Coals, June 2016, Energy Ventures Analysis, Inc.**
4. **Carbon Coefficients of U.S. and Indonesian Coals, June 2016, Energy Venture Analysis, Inc.**
5. **Substitution of Subbituminous Coal for Bituminous Coal in Asia, June 2016, Energy Ventures Analysis, Inc.**
6. **Review of Approaches for Significance and Mitigation, June 2016, Environmental Resources Management**

NAVIGANT

Memorandum

Date: June 2016

Re: Evaluation of the Statistical Confidence Level of the Draft EIS GHG Forecast Analysis

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Introduction/Background

This memo provides an evaluation of the Draft EIS's scenario-based approach and use of a single "preferred scenario" to project incremental new GHG emissions caused by the Project. Specifically, this memo evaluates the likelihood or probability that the Draft EIS preferred scenario is an accurate reflection of future conditions, in light of uncertainty surrounding input assumptions and evaluation of the full range of possible outcomes, and demonstrates how predicted outputs can change significantly based upon small differences in assumptions and inputs. Based on the foregoing analysis, this memo will discuss the overall confidence level surrounding the Draft EIS GHG forecast's conclusions. A confidence level represents the probability that the value of a parameter falls within a specified range of values.

The Draft EIS uses four scenarios to analyze the potential GHG emissions that would be caused by the Project for the 2018 to 2038 period.[1] The four scenarios include [2]:

- Past Conditions (2014)
- Lower Bound
- Upper Bound
- 2015 Energy Policy

The Draft EIS advocates the 2015 Energy Policy scenario as its "preferred" scenario for evaluating the net GHG emissions from the Project.

Summary Conclusion:

While the Draft EIS identifies various input assumptions in the four scenarios that are analyzed, the Draft EIS fails to fully disclose the uncertainty regarding the primary input assumptions and the likelihood or probability of the occurrence of these

[1] The Draft EIS also includes a cumulative scenario that evaluates the GHG emissions impact from the operation of numerous proposed coal export projects.

[2] Draft EIS. *The SEPA Coal Market Assessment Technical Report*, pp 5-1 - 5-6.

assumptions. Moreover, the Draft EIS fails to discuss the validity of the selected scenarios, the uncertainty regarding each scenario, and the likelihood or probability of occurrence. In addition, the Draft EIS presents a range of possible outcomes of net GHG emissions from the Project that does not reflect the potential outcome of the Project substantially reducing GHG emissions.

Upon close inspection, the Draft EIS relies on key assumptions that likely overstate GHG emissions attributed to the Project. The Draft EIS substantially overstates the Upper Bound of the GHG emissions impact range for the Project by using unreliable and untested assumptions that are extremely unlikely to occur. In addition, the Draft EIS does not give adequate weight to the potential likelihood or probability of the occurrence of a large negative GHG emissions impact from the Project in its preferred scenario and relies on certain assumptions that overstate the GHG emissions attributed to the Project.

When these factors are fully considered, the total evidence and analysis demonstrates that there is little probability that the GHG emissions resulting from the Project would be as large as in the Draft EIS preferred scenario. Moreover, a high confidence level exists that the GHG impact attributable to the Project is very low (i.e. de minimis) and likely negative.

This memo evaluates the validity of the Draft EIS approach to analyzing GHG emissions caused by the Project. Specific characteristics of the analysis evaluated include:

- 100% reliance on the 2015 Energy Policy scenario.
- No consideration of uncertainty concerning primary input assumptions.
- Inclusion of an unrealistic Upper Bound scenario that has little likelihood of occurrence.
- Lack of a more reasonable scenario showing that the Project would result in a much greater decrease in emissions than in the Lower Bound scenario.

Draft EIS Lacks Support for 100% Reliance on the 2015 Energy Policy Scenario

The Draft EIS selected the 2015 Energy Policy scenario as its "preferred" scenario for determining the net GHG emissions that would be caused by the Project. The Draft EIS provides no analytical or evidentiary support for its selection of the 2015 Energy Policy

scenario as its "preferred" scenario—but rather it simply states that this scenario is preferred because it is the most probable outcome.[3]

> Specifically, there is no supporting evidence or analysis to substantiate why other scenarios should not be given some amount of weight in the Draft EIS's conclusions concerning the level of GHG emissions likely to be caused by the Project. As discussed in the CPP memo, the 2015 Energy Policy scenario analysis uses input assumptions that are highly uncertain. This high degree of uncertainty with respect to multiple input variables greatly decreases the probability of likelihood that the scenarios will prove to be an accurate representation of what will occur in the future.

Draft EIS Does Not Sufficiently Ddisclose the Uncertainty Regarding Primary Input Assumptions and the Likelihood or Probability of Occurrence

It is important to disclose the uncertainty of primary input assumptions to determine the reliability of the inputs, because the results of the Draft EIS GHG emissions analysis are heavily dependent upon input assumptions. The Draft EIS fails to do so. A close examination of the Draft EIS analysis and the GHG emissions results shows that they are highly sensitive to the assumed input assumptions. The Draft EIS fails to conduct sensitivity analyses on any individual input assumption relied upon for the scenarios presented. Sensitivity analysis on individual input assumptions is one method that can be used to evaluate the reliability and uncertainty of the results with respect to specific input assumptions and to enable one to ascribe the appropriate evidentiary weight to the results.

While a comprehensive review is not possible due to the lack of supporting data provided with the Draft EIS, some examples of the untested input assumptions in the Draft EIS include[4]:

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[3] Draft EIS. The SEPA Coal Market Assessment Technical Report, p. 5-5. Draft EIS. Chapter 5. Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures, page 5.8-16. "The 2015 Energy Policy scenario is intended to represent existing conditions under which the Proposed Action would operate. Although the 2015 Energy Policy is based on the draft Clean Power Plan as proposed in June 2014, rather than the final Clean Power Plan promulgated in August 2015, this scenario is the most representative of current U.S. policy of the scenarios modeled, and consequently is the preferred scenario for the analysis."

[4] Other errors are discussed in the Subbituminous Substitution Memo and the Uinta Basin Coal Memo.

- **Induced Demand**[5]
  - The Draft EIS assumed induced demand for coal in the Pacific Basin based on assumed elasticity of demand estimates that range from .1 to 1.2.
  - Available evidence and economic analysis demonstrate that the elasticity of demand for subbituminous coal that is expected to be exported from the Project to the Pacific Basin region is likely to be de minimis and is best represented by the low end of the Draft EIS assumed elasticity of demand estimate, i.e., approximately .1.
- **Coal Substitution**[6]
  - The Draft EIS utilizes unreliable GHG emissions rates for coals to evaluate the relative coal quality of PRB and Indonesian subbituminous coal, which overstates GHG emission to the Project.
  - The Draft EIS utilizes unreliable heat content for coals to evaluate the relative coal quality of PRB and Indonesian coal.[7]
- **CPP**[8]
  - The Draft EIS relies on a draft proposal of the CPP for the 2015 Energy Policy scenario that has been revised, is currently stayed while under judicial review, and could be overturned or substantially modified by the courts, Congress, or a future presidential administration.
  - The Draft EIS overstates the impact of GHGs from the Project in the 2015 Energy Policy scenario by modeling inputs and assumptions that cap carbon dioxide (CO_2) levels and otherwise inhibit substitution of natural gas-fired power generation for coal-fired power plant generation.
  - The Draft EIS assumes, without explanation, that the GHG emissions commitments of various countries will be restricted accordingly while the emissions of other nations will continue without restriction.

These unrealistic input assumptions impact all of the scenarios, including the Draft EIS preferred scenario. Correcting the untested assumptions shows that there is a strong possibility of negative or de minimis levels of GHG emissions resulting from the Project and limited potential for substantial GHG emission from the Project.

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[5] See Demand Elasticity memo.

[6] See GHG Emission Rate of Coal Memo and Heat Content of Coal memo.

[7] This error causes an overstatement of GHG emissions from the Project attributed to railroad and shipping transportation because the errors in heat content erroneously cause higher volumes of U.S. coal to be exported from the Project to the Pacific Basin. See Heat Content of Coal memo.

[8] See Clean Power Plan memo.

Draft EIS Presents an Unrealistic Upper Bound Scenario That Has Little Likelihood of Occurrence

The Draft EIS presents an unrealistic range of potential outcomes for the net emissions that could be caused by the Project. The Draft EIS provides no evidence that it has identified the correct or complete range of possible outcomes, even assuming its calculations are accurate and reliable.[9] The Draft EIS also did not disclose the probability or likelihood of the expected outcome(s). An evaluation of the range of outcomes and input assumptions demonstrates that the Upper Bound scenario represents a statistical outlier and is not reliable.

A comparison of the Draft EIS scenarios and net GHG emissions for primary components is instructive for considering the reasonableness of the Upper Bound scenario (and the range of possible outcomes). Table 1 (below) shows the total net emissions from the largest emissions components in the Draft EIS, which includes the Pacific Basin and U.S. market-related emissions, as well as net emissions from international shipping and rail transportation attributed to the Project by the Draft EIS. These emissions account for 91% of total emissions included in the Draft EIS mitigation plan.[10]

[9] See Demand Elasticity memo, GHG Emission Rate of Coal memo, Heat Content of Coal memo, and Clean Power Plan memo.

[10] *The SEPA Greenhouse Gas Emissions Technical Report*, p 3-3, 3-7, 3-9 and 3-10. *Draft EIS Environmental Impact Statement: Summary p S-58.*

Table 1: Draft EIS Net Total GHG Emissions (MtC02e) from the Primary Components (2018-2038)[11]

	2015 Energy Policy	% Total	Lower Bound	% Total	Upper Bound	% Total	Past Conditions (2014)	% Total
Pacific Basin								
Induced	12,406,582	39%	-	0%	535,160,238	122%	29,944,771	-214%
Coal Substition	8,856,189	28%	12,106,757	-40%	(1,644,717)	0%	12,964,768	-93%
U.S. Market								
Decrease Coal	(2,518,738)	-8%	(66,717,663)	219%	(160,380,593)	-37%	(96,403,156)	690%
Increase Gas	1,497,089	5%	12,827,507	-42%	33,110,591	8%	23,415,889	-168%
Shipping	2,595,112	8%	2,168,462	-7%	22,161,047	5%	6,947,758	-50%
Rail	9,240,632	29%	9,116,598	-30%	9,774,949	2%	9,166,339	-66%
Total	32,076,866		(30,498,339)		438,181,515		(13,963,631)	
Total (No Induced Upper)	19,670,284		(30,498,339)		(96,978,723)		(43,908,402)	

This table shows that the net GHG emissions associated with the Upper Bound scenario is an outlier value relative to the other possible outcomes presented in the Draft EIS, because the values of the other three scenarios (Past Conditions [2014], Lower Bound, and 2015 Energy Policy) are relatively close together (i.e., statistically represented with a tighter central tendency). When an estimate is substantially different from the rest of the range of potential outcomes, its reasonableness should be considered.

In this case, the Upper Bound scenario reports significantly higher emissions than the other scenarios, including 13 times higher than the Energy Policy scenario, which is the only other scenario that reports increased emissions from the Project (Table 1).

In light of the differences described above, a brief evaluation of the Upper Bound scenario was conducted. Upon closer inspection, the Draft EIS's reported results for the Upper Bound scenario are substantially driven by two factors: the induced demand component and the increased demand for coal.

[11] Net total GHG emissions from the primary components include Pacific Basin and U.S. markets plus shipping and rail transportation. *The SEPA Greenhouse Gas Emissions Technical Report*, p 3-3, 3-7, 3-9 and 3-10.

The induced demand component is based on an assumed elasticity of demand value ranging from .1 to 1.2. [12] The Draft EIS's Upper Bound scenario relies on the highest maximum elasticity of demand statistic equal to 1.2, which is more than 10 times larger than the minimum elasticity of demand statistic in the Draft EIS equal to .1. [13] Available evidence and economic analysis demonstrate that the elasticity of demand for subbituminous coal that is expected to be exported from the Project to the Pacific Basin region is likely to be de minimis and have a negligible impact on coal consumption in the countries that will likely receive deliveries of this coal (South Korea, Japan, and Taiwan).[14] As such, the Lower Bound minimum elasticity (identified by the Draft EIS of .1) is most appropriate and reasonable for the Project.

Another input assumption used in the Upper Bound scenario that impacts the GHG emissions is the assumption of a 50% increase in coal demand.[15] A surge in future coal demand of substantial magnitude seems unlikely, as our energy industry has become increasingly diversified in fuel supply sources suggesting such coal demand growth targets in this range may no longer be realistic. Moreover, one possible factor that could cause a dramatic increase in future coal demand is if a carbon capture technology breakthrough occurs. This technological breakthrough would virtually eliminate carbon emissions from coal-generating power plants. Efforts to develop carbon capture and sequestration (CCS) technology continues to be made and, if successful, coal plants with CCS observe the greatest reductions in CO_2, if utilized.[16] CCS technology is most

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[12] Draft EIS. *The SEPA Coal Market Assessment Technical Report*, p 5-2.

[13] Draft EIS. *The SEPA Coal Market Assessment Technical Report*, p 5-2.

[14] As discussed in the Demand Elasticity memo, the following reasons support the Lower Bound minimum elasticity (identified by the Draft EIS of .1) as the most appropriate and reasonable for the Project based on the following: 1. The substantial government planning role in South Korea, Japan, Taiwan, and China determines the extent that coal-fired power plants will be built and is not likely to change as a result of the Project. Also, economic decision-making for building new coal-fired power plants in South Korea, Japan, and Taiwan is not materially changed as a result of the Project. 2. Economics of the coal fleets in South Korea, Japan, and Taiwan are largely baseload power plants and therefore can be expected to operate continuously, regardless of a small change in coal fuel costs. 3. The economics of the short run marginal cost (SRMC) demonstrates that coal-fired power plants don't compete with natural gas-fired power plants in South Korea, Japan, and Taiwan. 4. The total retail electricity rate of each country's customers would be negligibly impacted by a small change in coal fuel costs, and as such are not likely to increase electricity consumption (e.g., turn on more lights, run more appliances, etc.) in South Korea and Japan. 5. Efficiencies of coal-fired power plants in Japan, South Korea, and Taiwan are superior to the U.S. power plants and therefore consume less coal quantities to generate one unit of electricity.

[15] Draft EIS. *The SEPA Coal Market Assessment Technical Report*, p 5-2, 5-4.

[16] Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014, pp 13-14. See also Congressional bipartisan group introduces carbon

suitable for larger, more efficient (i.e., younger) coal plants, which generally characterize the Asian power fleet as compared to the U.S. fleet.[17]

In addition to CCS technology, other technological developments are under way that would eliminate GHG emissions from coal-fired power plants. Specifically, a new company, Net Power, has developed technology to capture the carbon as part of the combustion process itself at no extra cost, resulting in zero air pollution (i.e., full capture of the carbon).[18] Net Power is working to develop the Allam Cycle, which is a high-pressure, highly recuperative, oxyfuel, supercritical CO_2 cycle. By burning fuel with pure oxygen at high temperatures, most airborne emissions are avoided, and using carbon dioxide rather than steam to propel the engine eliminates secondary CO_2 emissions.[19] For these reasons a 50% surge in coal demand is unlikely; it would only be likely to occur in conjunction with the use of new emissions reduction technologies that would avoid material increases in GHG emissions as a result of increased coal use.

Since the Upper Bound scenario results are largely driven by two factors: the induced demand component and the increased demand for coal, which are unrealistic and unsupported, the Upper Bound scenario is not reliable and should be disregarded.

Evaluation of the Impact of Removing Upper Bound Scenario and Induced Demand Impact

In light of the concerns described above, sensitivity analyses were conducted to understand the impact of removing the Upper Bound scenario, the induced demand component, the assumed coal substitution, and the assumed CPP impacts on the net GHG emissions attributed to the Project.

First, an analysis was conducted to evaluate the impact of removing the induced demand component and the Upper Bound scenario from the Draft EIS scenarios. This analysis, presented in Table 2 (below), shows that these adjustments have a material

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capture bill in House, February 26, 2016. http://www.utilitydive.com/news/congressional-bipartisan-group-introduces-carbon-capture-bill-in-house/414597/

[17] Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014, pp 13-14.

[18] Net Power is working with several companies including Exelon Generation, a power utility; CB&I, an engineering, procurement, and construction services-infrastructure firm; and Toshiba, a turbine manufacturer. "Fossil fuel electricity with no pollution? This company is building a power plant to prove it." Vox Energy and Environment. April 5, 2016. http://www.vox.com/2016/4/5/11347962/net-power

[19] "Fossil fuel electricity with no pollution? This company is building a power plant to prove it." Vox Energy and Environment. April 5, 2016. http://www.vox.com/2016/4/5/11347962/net-power

impact on the range of possible outcomes presented by the Draft EIS. Specifically, these adjustments extend the range of possible outcomes to substantially lower and negative levels of net emissions, well below the lowest level of net emissions relied upon by the Draft EIS to calculate mitigation (i.e., the 2015 Energy Policy scenario).

Table 2: Draft EIS Net Total GHG Emissions (MtC02e) from the Primary Components (2018-2038):—Removing the Induced Demand Impact and the Upper Bound Range[20]

Scenarios*	Draft EIS	Exclude Induced Demand
2015 Energy Policy	32,076,866	19,670,284
Lower Bound	(30,498,339)	(30,498,339)
Past Conditions (2014)	(13,963,631)	(43,908,402)
Average Scenarios	(4,128,368)	(18,245,486)
*All Scenarios Exclude Upper Bound Estimates		

Table 2 shows that removing the induced demand component from the 2015 Energy Policy scenario reduces the net emissions attributed the Project by 38% from 32 million to 19.67 million MtC02e. Also, the average of the remaining three scenarios (after removing the induced demand component and the Upper Bound scenario) yields a negative 18,245,486 M MtC02e net GHG emissions impact from the Project. Relying on an average of the three scenarios implies that 33% weight or probability of likelihood is attributed to each scenario.

Evaluation of the Impact of Removing Coal Substitution Impact (Cumulatively)[21]

The Draft EIS overstated the GHG attribution to the Project due to coal substitution that is the result of its reliance on inaccurate GHG emissions rates and heat content

[20] Net total GHG emissions from the primary components includes Pacific Basin and U.S. markets plus shipping and rail transportation. *The SEPA Greenhouse Gas Emissions Technical Report*, p 3-3, 3-7, 3-9 and 3-10.

[21] Note: the Upper Bound scenario and the induced demand impact are also removed.

assumptions to evaluate the relative coal quality of PRB and Indonesian subbituminous coal. [22]

The following analysis evaluates the impact of fixing the error by eliminating the coal substitution GHG impact included in the Draft EIS. Table 3 (below) begins with Table 2 and adds a column that eliminates the induced demand and the coal substitution impact on GHG emissions from the Draft EIS results for the 3 scenarios (excluding the Upper Bound Scenario).

Table 3 shows that removing the induced demand component and coal substitution impact from the 2015 Energy Policy scenario reduces the net emissions attributed the Project by 66% from 32 million to 10.8 million MtC02e. Also, the average of the remaining three scenarios (after removing the induced demand component, the coal substitution impact, and the Upper Bound scenario) yield a negative 29,554,724 M MtC02e net GHG emissions impact from the Project. Relying on an average of the three scenarios implies that 33% weight or probability of likelihood is attributed to each scenario.

Table 3: Draft EIS Net Total GHG Emissions (MtC02e) from the Primary Components (2018-2038):—Removing the Upper Bound Range, Induced Demand Impact and Coal Substitution Impact[23]

Scenarios*	Draft EIS	Exclude Induced Demand	Exclude Induced Demand & Coal Substitution
2015 Energy Policy	32,076,866	19,670,284	10,814,095
Lower Bound	(30,498,339)	(30,498,339)	(42,605,096)
Past Conditions (2014)	(13,963,631)	(43,908,402)	(56,873,170)
Average Scenarios	(4,128,368)	(18,245,486)	(29,554,724)

*All Scenarios Exclude Upper Bound Estimates

[22] See Coal Carbon Coefficients Report and Indonesian Coal Quality Report.

[23] Net total GHG emissions from the primary components include Pacific Basin and U.S. markets plus shipping and rail transportation. *The SEPA Greenhouse Gas Emissions Technical Report*, p 3-3, 3-7, 3-9 and 3-10.

Evaluation of the Impact of Correcting the CPP Energy Policy Scenario (Cumulatively)[24]

The Draft EIS relies on a Draft proposal of the CPP that is stayed while under judicial review for the 2015 Energy Policy scenario and overstates the impact of the CPP due to methodology errors. This overstatement is evidenced by comparing the GHG emissions assumed in the Past Conditions (2014) scenario to the 2015 Energy Policy scenario. For example, the U.S. GHG emissions are 71 times lower in the Past Conditions (2014) scenario as compared to the 2015 Energy Policy scenario reported by the Draft EIS.[25]

The following analysis evaluates the impact of fixing the error by utilizing the U.S. GHG emissions reported by the Draft EIS for the Past Conditions (2014) scenario instead of the 2015 Energy Policy scenario. Table 4 (below) begins with Table 3 and adds a column that fixes the error of relying on the CPP and eliminates the induced demand and the coal substitution impact on GHG emissions from the Draft EIS results for the three scenarios (excluding the Upper Bound scenario).

Table 4 shows that fixing the error of relying on the CPP and removing the induced demand component and coal substitution impact from the 2015 Energy Policy scenario produce negative net emissions attributed to the Project (reducing the net emissions from 32 million to negative 61.1 million MtC02e). Also, the average of the remaining three scenarios (after removing the induced demand component, the coal substitution impact, and the Upper Bound scenario) yield a negative 59,908,967 M MtC02e net GHG emissions impact from the Project. Relying on an average of the three scenarios implies that 33% weight or probability of likelihood is attributed to each scenario.

[24] Note: the Upper Bound scenario, the induced demand, and coal substitution impact are also removed.
[25] 71=-96,403,156+23,415,889/(1,497,089+-2,518,738).

Table 4: Draft EIS Net Total GHG Emissions (MtC02e) from the Primary Components (2018-2038)—Removing the Upper Bound Range, Induced Demand Impact, and Coal Substitution Impact, Using the U.S. GHG Emissions from the Past Conditions (2014)[26]

Scenarios*	Draft EIS	Exclude Induced Demand	Exclude Induced Demand & Coal Substitution	Exclude Induced Demand & Coal Substitution with 2014 Scenario
2015 Energy Policy	32,076,866	19,670,284	10,814,095	(61,151,523)
Lower Bound	(30,498,339)	(30,498,339)	(42,605,096)	(61,702,207)
Past Conditions (2014)	(13,963,631)	(43,908,402)	(56,873,170)	(56,873,170)
Average Scenarios	(4,128,368)	(18,245,486)	(29,554,724)	(59,908,967)

*All Scenarios Exclude Upper Bound Estimates

Conclusion

These sensitivity analyses enable a critical examination of the range of possible outcomes of the GHG impact attributable to the Project and demonstrate the substantial evidence of large negative GHG emissions attributable to the Project.

Based on the above evaluation, a reasonable revised range of possible outcomes attributable to the Project should exclude the unreliable Upper Bound scenario and include the large negative GHG emission scenario attributable to the project reported in Table 4. Figure 1 below illustrates the revised range of possible outcomes attributable to the Project.

[26] Net total GHG emissions from the primary components include Pacific Basin and U.S. markets plus shipping and rail transportation. *The SEPA Greenhouse Gas Emissions Technical Report*, p 3-3, 3-7, 3-9 and 3-10.

Figure 1: Draft EIS Revised Range of Net Total GHG Emissions (Million MtC02e) from the Primary Components (2018-2038)[27]



* Draft EIS Scenarios Corrected to Exclude Induced Demand & Coal Substitutions and uses the 2014 Past Scenario for U.S. emissions.

The revised range of possible outcomes attributable to the Project extends from approximately positive 30 to negative 60 million MtC02e. The average of the five scenarios presented in Figure 1 equals negative 12.3 million MtC02e. This figure also shows that the middle three scenarios are relatively close, with GHG emissions attributable to the Project ranging from positive 10 to negative 30 million MtC02e. The average of the middle three scenarios presented in Figure 1 (eliminating the highest and lowest scenario estimates) equals negative 11.1 million MtC02e.

For all of the reasons discussed above the analysis of the revised range of possible outcomes attributable to the Project is evidence that a high confidence level exists that the GHG impact attributable to the Project is very low and likely negative.

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[27] Net total GHG emissions from the primary components include Pacific Basin and U.S. markets plus shipping and rail transportation. *The SEPA Greenhouse Gas Emissions Technical Report*, p 3-3, 3-7, 3-9 and 3-10.

NAVIGANT

Memorandum

Date: June 2016

Re: Evaluation of Draft EIS Assumed Induced Demand for Coal in the Pacific Basin Based on an Elasticity of Demand Assumption

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Introduction/Background

The following memo evaluates the assumptions used in the Millennium Bulk Terminals – Longview Draft Environmental Impact Statement (Draft EIS) to quantify the degree of new GHG emissions that would be caused by opening a new coal export terminal (Project) on the Columbia River in Washington State. More specifically, this memorandum evaluates the assumption used in the Draft EIS of a uniform coal demand elasticity across the entire Pacific Basin region.

Price elasticity of demand (referred to generically in the Draft EIS as demand elasticity) is an economic measure that represents the responsiveness of the quantity demanded of a good or service to a change in its price, *ceteris paribus*. For example, if the quantity demanded for a good increases 1% in response to a 5% decrease in price, the price elasticity of demand would be 1% / 5% = .2. The degree to which the quantity demanded for a good adjusts in response to a change in price can be influenced by a number of factors. One factor is whether the good is a necessity or luxury; necessities tend to have inelastic demand, while luxuries are more elastic in nature. Also, the elasticity of demand can vary based on the availability of close substitutes with more elastic demand.

Conclusion:

The Draft EIS assumed induced demand for coal in the Pacific Basin based on a range of elasticity of demand estimates that range from .1 to 1.2, and relies on the average elasticity of demand estimate of .4 for the preferred scenario (2015 Energy Policy scenario.) Based on the following analysis and discussion, available evidence and economic analysis demonstrate that the elasticity of demand for subbituminous coal that is expected to be exported from the Project to the Pacific Basin region is likely to be de minimis and have a negligible impact on coal consumption in the countries that will likely receive deliveries of this coal (South Korea, Japan, and Taiwan). As such, the

Lower Bound minimum elasticity identified by the Draft EIS of .1 is most appropriate and reasonable for the Project. This is due to the following reasons:

1. The substantial government planning role in South Korea, Japan, Taiwan, and China determines the extent that coal-fired power plants will be built and is not likely to change as a result of the Project. Also, economic decision-making for building new coal-fired power plants in South Korea, Japan, and Taiwan is not materially changed as a result of the Project.
2. The coal fleets in South Korea, Japan, and Taiwan are largely baseload power plants and therefore can be expected to operate continuously, regardless of a small change in coal fuel costs.
3. The economics of the short run marginal cost (SRMC) demonstrates that coal-fired power plants do not compete with natural gas-fired power plants in South Korea, Japan, and Taiwan.
4. The average retail electricity rate of each country's customers would be negligibly impacted by a small change in coal fuel costs and, as such, any decrease in rates would be negligible and would not likely lead to increased electricity consumption (e.g., turn on more lights, run more appliances, etc.) in South Korea and Japan.
5. Efficiencies of coal-fired power plants in Japan, South Korea, and Taiwan are superior to the U.S. power plants and they therefore consume less coal to generate one unit of electricity.

Based on the totality of evidence and analysis completed, the Draft EIS assumed elasticity of .4 for the 2015 Energy Policy scenario is substantially overstated. Further, the Lower Bound minimum elasticity identified as .1 is more likely to be a reasonably appropriate elasticity estimate for the Pacific Basin countries that will likely receive deliveries of subbituminous coal from the Project (South Korea, Japan, and Taiwan).

Description of the Draft EIS Assumed Induced Demand for Coal

The Draft EIS relies on a literature search to identify a range of coal demand elasticities,[1] and then chooses a value from within that range for each of four different scenarios to calculate an induced level of new coal consumption in the Pacific Basin that would result from the change in delivered coal prices the Draft EIS assumes would be caused by Project operations. The increased level of coal consumption is then used to

[1] The literature survey identified eight studies of energy specific demand elasticities that bracket a very wide range of coal demand elasticity.

determine an increase in Pacific Basin GHG emissions that is attributed to the Project.[2] The Draft EIS elasticity assumptions chosen for each of the scenarios are as follows: [3]

- Lower Bound uses the minimum elasticity identified equal to 0.1.
- Upper Bound uses the maximum elasticity identified equal to 1.2.
- Past Conditions (2014) uses the average elasticity in the eight studies equal to 0.4.
- 2015 Energy Policy uses the average elasticity in the eight studies equal to 0.4.[4]

The discussion and analysis associated with the Draft EIS's attribution of a substantial quantity of increased GHG emissions to the Project from coal combustion due to induced demand is captured by the Draft EIS in a single paragraph:

> "Because the international coal demand is a forecast that is an input to the model, coal demand elasticity was used to adjust the demand based on the change in delivered coal prices. The demand elasticity is a measure of how much coal demand will change with a given change in the delivered coal price. As delivered coal prices change, the demand for coal changes in the opposite direction. ICF conducted a literature search to identify an energy-specific demand elasticity for this analysis. A total of eight sources were reviewed that provided demand elasticity for electricity, natural gas, and coal. The demand elasticity found in the sources ranged from a minimum of 0.11% to a maximum of 1.2%. Thus, for a 1.0% decrease in delivered coal prices there would be an increase in demand of between 0.11% and 1.2%. For the Past Conditions (2014) Scenario, the average of the eight sources, 0.4%, was used for the coal demand elasticity. The Lower and Upper Bound Scenarios used the minimum and maximum demand elasticity values from the literature search."[5]

For the Past Conditions (2014) and 2015 Energy Policy scenarios, the Draft EIS assumed average elasticity of demand is equal to .4 (based on the average of the eight literature search studies). The Draft EIS uses the .4 elasticity along with its calculation of the decrease in global coal prices resulting from the Project (not reported in the Draft EIS) to estimate the additional quantity coal demand (i.e., induced) from the Project. Specifically, the Draft EIS assumes that the quantity of coal demanded will increase by

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[2] Draft EIS. *The SEPA Coal Market Assessment Technical Report*, p 4-11.
[3] *Id.* at p. 4-11.
[4] *Id.* at p 5-5.
[5] Draft EIS. *The SEPA Coal Market Assessment Technical Report*, page 5-2. Table 23.

2% in response to a 5% decrease in price. In other words, the price elasticity of demand is 2% / 5% = .4 for the Past Conditions (2014) and 2015 Energy Policy scenarios.

Table 1 (below) reports the net GHG emissions the Draft EIS attributes to the Project from induced coal demand in the Pacific Basin. This table shows that the Draft EIS induced demand assumption causes 58% of the increase in net emissions from coal combustion in the Pacific Basin in the 2015 Energy Policy scenario. The Draft EIS induced demand assumption causes 70% and 100% of the increase in net emissions from coal combustion in the Pacific Basin in the Past Conditions and Upper Bound scenarios, respectively. According to the Draft EIS, induced demand has no impact in the Lower Bound scenario.[6]

Table 1: Net Emissions Coal Combustion from Induced Demand, Pacific Basin ($MtCO_2e$)[7]

	2015 Energy Policy	Lower Bound	Upper Bound	Past Conditions (2014)
Net Annual Emissions, 2028	867,958	0	37,439,547	2,094,921
Net Total Emissions, 2018–2038	12,406,582	0	535,160,238	29,944,771
Percent of Total (Induced Demand and Substitution)	**58%**	**0%**	**100%**	**70%**
Net Total Emissions from Coal Induced and Substitution, 2018–2038	21,262,771	12,106,757	533,515,521	42,909,539

Economic Analyses of Induced Demand and Elasticity

The Draft EIS relies on assumed elasticity of demand estimates to calculate an induced level of coal demand (i.e., new consumption) in the Pacific Basin based on the change in delivered coal prices the Draft EIS forecasts to result from the Project operations. Although a more thorough economic analysis could have been conducted, it is worth noting that even with a more rigorous economic analysis, challenges to forecasting reliably remain high. The evidence presented here and in the forecasting reliability

[6] This result appears inconsistent with the Draft EIS reported .1 elasticity assumption.

[7] Draft EIS. *The SEPA Greenhouse Gas Emissions Technical Report*, p. 3-9.

memo demonstrates that the Draft EIS' GHG emissions forecasts are especially unreliable because inaccurate or unreliable input assumptions were used, particularly in the following areas:

- Coal Combustion from Induced Demand, Pacific Basin Coal – uncited/assumed elasticity of demand estimate
- Coal Combustion from Coal Substitution, Pacific Basin Coal[8]
    - incorrect GHG emissions rates for coals
    - incorrect heat content for coals
- Clean Power Plan - Energy Policy Assumption
- Substitution of Subbituminous Coal for Bituminous Coal in the Pacific Basin
- Export of Uinta Basin Coal through MBT - Longview
- Failure to Consider Existing Export Terminals for Uinta Basin Coal

In addition, substantially reduced forecasting reliability exists because of other aspects of the underlying Draft EIS forecast, such as a forecast that covers a very large geographic area over an extremely long time horizon for complicated and interrelated energy markets undergoing dramatic evolutions.[9]

As discussed above, the Draft EIS GHG analysis is based on assumptions of demand elasticity that are themselves chosen from uncited and untested studies.

The following analyses were conducted for this memorandum in order to evaluate the potential for coal exported from the Project to induce greater demand for coal in Pacific Basin countries, thereby resulting in increased GHG emissions:

1. Evaluation of government planning roles and economic decision-making for building new coal-fired power plants and how the Draft EIS forecasted change in coal prices resulting from the Project would impact these decisions, if at all.
2. Evaluation of the economics of the coal-fired power plant fleets for selected countries in the Pacific Basin and the baseload nature of these fleets over the forecast period. A baseload power plant will operate continuously around the clock as

[8] See Carbon Coefficients Report and Indonesian Coal Quality Report.

[9] The energy markets face many market and non-market factors that contribute to the current state of challenges in reliably forecasting energy market behavior. Market-related factors relate to industry-specific developments that impact supply, demand, and pricing of energy-related products. Non-market factors relate to regulatory intervention and existing and potential requirements that impact supply, demand, and pricing of energy related products.

available, regardless of a small change in fuel prices that could arise from the Project.[10]

3. Evaluation of SRMC for selected countries in the Pacific Basin to see if operating coal-fired power plants compete with natural gas-fired power plants, which could create increased coal demand associated with increased coal-fired power generation (substituting for other fuels, such as natural gas-fired power plants). Evaluation of the impact of the Draft EIS forecasted change in coal prices resulting from the Project on SRMC.
4. Evaluation of retail customer electricity rates for selected countries in the Pacific Basin to determine the impact of a change in coal fuel prices on retail customer electricity rates, and evaluation of the potential likelihood of increased consumption.[11]
5. Evaluation of the differences in efficiencies between existing and planned power plants in the U.S. and selected countries in the Pacific Basin (Japan, South Korea, and Taiwan) expected from the Project (over the course of its operating life) to determine if a power plants operating in selected countries in the Pacific Basin produces more or less GHG emissions per unit of electricity produced.

The results of this work are provided below. Collectively, these economic analyses demonstrate that the elasticity of demand for the subbituminous coal that is expected to be exported from the Project is likely to be de minimis and result in negligible levels of induced demand in the countries that will likely receive deliveries of coal from the Project (South Korea, Japan, and Taiwan).

A. Evaluation of government planning roles and economic decision-making for building new coal-fired power plants and how the Draft EIS forecasted change in coal prices resulting from the Project would impact these decisions, if at all.

By using an assumed elasticity of demand to quantify induced coal consumption in the Pacific Basin, the Draft EIS avoids the question of whether a new coal-fired power plant would be built in South Korea, Taiwan, and Japan as a result of the Project. However, the answer to this question has significant implications for any evaluation of the validity of the demand elasticity assumed by the Draft EIS analysis. If coal demand is induced, it means that either more coal is used as a result of increased operational levels

[10] This economic analysis is the subject of a separate memo.

[11] I have not evaluated the potential induced coal consumption from bituminous coal based on the analysis of EVA that demonstrates that subbituminous coal does not compete with bituminous coal.

at existing coal plants or additional coal consumption will result from operating newly-built, coal-fired power plants.[12] This section will analyze whether the Project would likely result in the construction of new coal-fired power plants in South Korea, Japan, Taiwan, and China.

As discussed in more detail in Appendix A, the national government plays a substantial planning role in the decision-making concerning construction of new coal-fired power plants in South Korea, Japan, Taiwan, and China. The selection of the type of power plants is generally predetermined by the government entities and implemented by the energy sector. China and Taiwan's role in government planning for the selection of power plant types is substantial, while South Korea's and Japan's role in government planning is significant with some modest level of flexibility and input by constituents. For these reasons a small change in the price of coal that may result from the Project will not likely have an impact on government planning decisions to build new coal-fired power plants.

An analysis of the economic decision-making of building a new coal-fired power plant in South Korea, Taiwan, and Japan demonstrates that it is not likely to change due to a small change in the price of coal that may result from the operations of the Project. Coal-fired power plants are very large, capital-intensive projects, which can cost $1 billion to $2 billion or more depending on the size and technology. A small change in the price of coal has no impact on the total capital cost and a de minimis impact on the total annual capital and operating costs.

For these reasons, no new coal-fired power plants are likely to be built based on government planning or economic considerations as a result of the Project, which is evidence of a zero elasticity of demand (associated with newly-built power plants).

B. Evaluation of the economics of the coal-fired power plant fleets for selected countries in the Pacific Basin and the baseload nature of these fleets over the forecast period.

Research and analysis of economic conditions of electrical load shapes and minimum load forecasts for Japan, South Korea, Taiwan, and China was conducted. The purpose of the research is to gather data to analyze and evaluate whether coal-fired power plants are expected to operate as baseload power plants in the future forecast period

[12] Coal that is anticipated to be exported from the Project, such as PRB-originating coal, is used in coal-fired power plants to generate electricity.

when the Project is operating. A baseload power plant will operate continuously around the clock as available, regardless of a small change in fuel prices that could arise from the Project. If coal plants in these countries operate on a baseload basis, then they operate whenever they are available (i.e., throughout all hours of the day and seasons of the year). Said differently, a change in the price of coal will not cause these power plants to run more frequently.

Conclusion:

An evaluation of the economic characteristics of the electricity generation portfolio and the electrical load shapes in the Asian countries, and how these countries reliability operate their power system, demonstrates that a low elasticity of demand exists for coal consumed for power generation on an aggregate country level. This means that coal facilities are largely needed to operate continuously around the clock. As such, they have limited opportunity to operate more if coal prices fall for various reasons, including as a result of the operation of the Project. As such, operation of the Project is not likely to result in power generated from coal-fired power plants displacing power that would otherwise have been generated from natural gas-fired power plants.

By way of background, an electrical load shape reflects the variation in power usage over the days of the week and hours of the day. Specifically, the pattern of electrical consumption is generally low in the middle of the night, slowly rising in the morning, peaking in the middle of the day, and falling in the evening hours. As energy consumption (i.e., demand) rises over the day, additional power plants are turned on to increase the supply of power. Similarly, as energy demand falls, power plants are turned off. Operations are sequenced to turn on the lowest cost units first and only operate higher cost units as needed. SRMC is the economic cost metric used to identify the rank order of the power plants to conduct the economic operations of a power system, which is frequently referred to as least-cost dispatch.

For this research, we investigated government sector, electricity industry organizations and other publicly available sources to identify available electric demand data.

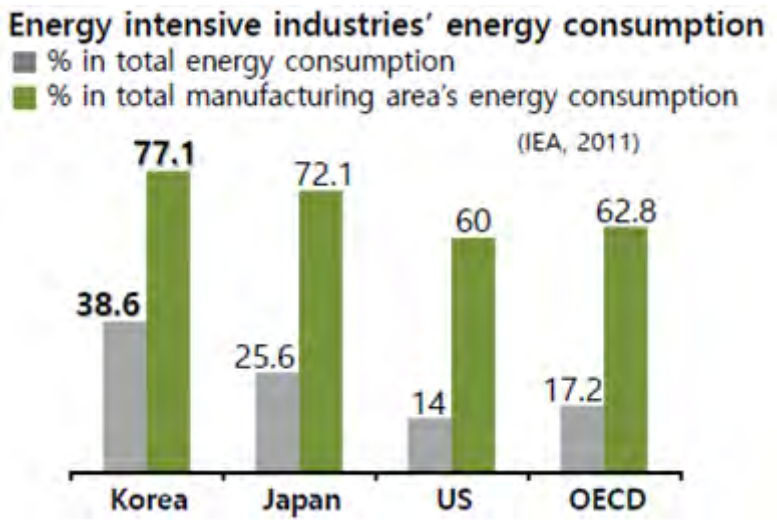
General Economic Data Impacting Load Shapes and Minimum Load Forecast

Economic and industry research was conducted to identify evidence of the economic characteristics that provide insight into the electrical load shapes and minimum load levels for the Asian countries. Recent statistics indicate that Japan, Korea, Taiwan, and

China have a relatively high percentage of industrial customers, notably compared to the U.S., which has a larger proportion of residential and commercial customers. A higher mix of industrial customers will yield a flatter load shape and higher levels of power consumption during the off-peak hours of the day (i.e., the middle of the night) which is used to meet around-the-clock electric needs. In contrast, residential and commercial customers that generally sleep at night consume lower levels of electricity.

As Table 2 (below) demonstrates, Japan and South Korea have a higher share of industrial customers, consisting of 38.6% and 25.6% energy-intensive industries (e.g., steel, refinery, chemical), respectively, as well as other manufacturing industries, in comparison to other major economies such as the U.S. Moreover, 60.7% of South Korea's energy production is used in industrial and manufacturing operations, and the country has continually focused on industrial competitiveness in long-range planning.[13]

Table 2: Japan and Korea Energy-Intensive Industries' Share of Energy Consumption[14]



Taiwan also has a very large component of its electricity consumed by industrial customers, because this country's economy is centered on the industrial sector. For

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[13] Korea's Energy Policy, November 12th, 2015. Kim, Chang Kyu, Minister-Counselor for Trade, Industry & Energy. Embassy of the Republic of Korea at D.C., p. 2. http://www.mofa.go.kr/webmodule/download_hts.jsp?boardid=13871&filename=2015+Korea+Energy+Forum+-+Kim%2C+Chang+Kyu.pdf&shadowname=file_20151121043315053_0

[14] Korea's Energy Policy, November 12th, 2015. Kim, Chang Kyu, Minister-Counselor for Trade, Industry & Energy. Embassy of the Republic of Korea at D.C., pp. 3, 9. http://www.mofa.go.kr/webmodule/download_hts.jsp?boardid=13871&filename=2015+Korea+Energy+Forum+-+Kim%2C+Chang+Kyu.pdf&shadowname=file_20151121043315053_0

example, in 2014, 53.80% of the electricity produced in Taiwan was consumed by industrial customers, which is even higher than either Japan or South Korea.[15] Industrial development and revitalization remain a high policy objective for Taiwan's future business activity.[16]

In addition, China has historically relied substantially on heavy industrial activity, which requires a more continuous supply of electricity. For example, in 2010, heavy industrial manufacturers accounted for nearly one-quarter of China's primary energy demand and about 60% of its electricity demand.[17] While the Chinese economy is evolving, it has higher industrial demand in the near term which will recede somewhat by 2040, but remain at or above current levels across the forecast period.[18]

Electrical Load Shapes and Minimum Load Data

While substantial research was conducted to identify load shape data, ultimately limited data is reported and publicly available. The most comprehensive data identified was reported in an academic study of Northeastern Asia power markets that developed load shapes for China, Japan, South Korea, and Russia, and numerous sub-regions in certain countries (referred to hereafter as "Power Grid Study").[19] Load shapes used in

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[15] Energy Supply and Demand Situation of Taiwan in 2014. Ministry of Economic Affairs of the Republic of China (MOEA), p 7. https://web3.moeaboe.gov.tw/ECW/english/content/wHandMenuFile.ashx?menu_id=1551

[16] Forward-looking Trends and Industry Optimization Industry Upgrading and Transformation Action Plan, Annual. Industrial Development - Industries will gain new growth momentum through intelligent, green, and cultural creative applications. Industrial Development Bureau, Taiwan, Ministry of Economic Affairs. https://www.moeaidb.gov.tw/external/ctlr?PRO=english.About01&lang=1

[17] The Outlook for Energy: A View to 2040, China Edition. ExxonMobil, p. 14. http://cdn.exxonmobil.com/~/media/global/files/outlook-for-energy/em-2015-energy-outlook-chinese.pdf

[18] China's heavy industry demand is seen peaking around 2020 and then beginning to decline. This is the result of three factors: (1) a moderation in the rate of urban infrastructure development, reducing the demand for steel and cement; (2) a shift toward high-tech, lighter manufacturing, and services in China's economy; and (3) continued improvements in energy efficiency. We expect that by 2040, energy demand from China's heavy industry sector will have fallen back to 2012 levels. The decline in heavy industry demand post-2020 is expected to more than offset growth in other sectors. Consequently, we expect China's overall energy demand to peak around 2030. The Outlook for Energy: A View to 2040, China Edition. ExxonMobil, p. 14. http://cdn.exxonmobil.com/~/media/global/files/outlook-for-energy/em-2015-energy-outlook-chinese.pdf

[19]Electric power grid interconnections in Northeast Asia: A quantitative analysis of opportunities and challenges. Energy Policy. Takashi Otsuki, Aishah Binti MohdIsa, Ralph D. Samuelson. http://www.sciencedirect.com/science/article/pii/S0301421515301993 Other research did not identify system load profile data from the power system operators, government agencies for these countries, or electricity providers.

the Power Grid Study were developed by the study authors based on certain data they accessed from the country government agencies and electricity companies. The underlying source data and the output of the study is not publicly available. The load shape data reported in the Power Grid Study is presented in Table 3 (below) and reports the load shape for the hours of the day during the summer and winter seasons of the year for each country and region. It also reports the ratio of electric demand during the hours of the day as compared to the peak electric demand hour over the year.

Table 3: Electric Load Curve, Summer-peak and Winter-peak Seasons[20]

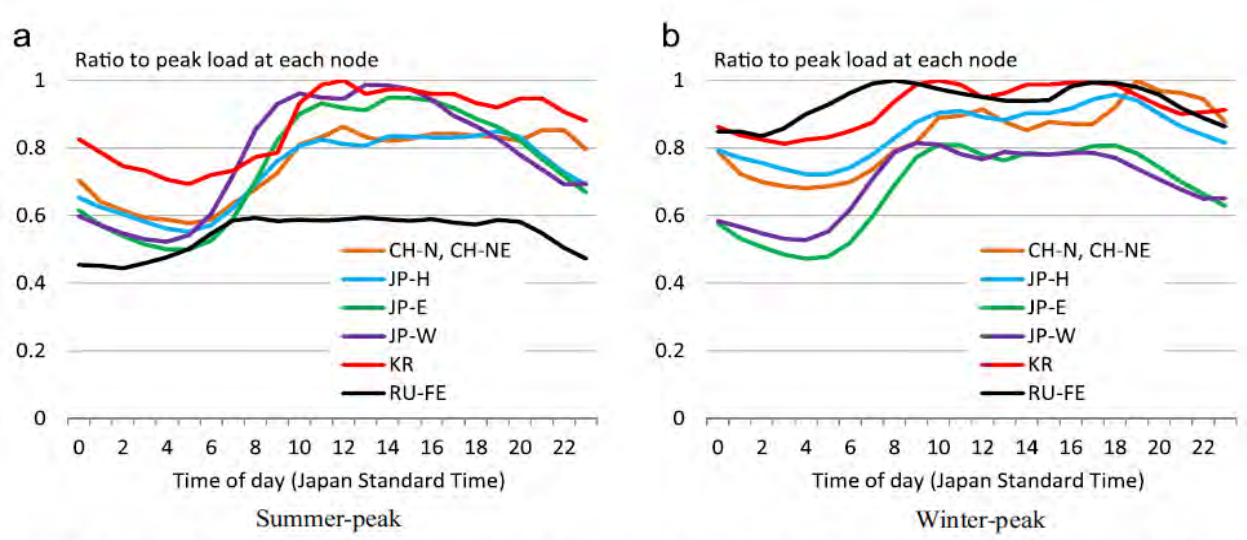


Fig. 3. Estimated electric load curve at city nodes in the summer-peak and winter-peak seasons (ratio to peak load at each node).

Electrical Load Shape Analyses and Evaluation of Baseload Coal Power Plants

The forthcoming section provides the results of the electrical load shape analysis conducted for each country and evaluates how coal-fired power plants may be expected to be operated in the future.

Japan

An economic analysis was conducted to determine if the coal fleet anticipated to be operating in 2030 in Japan may reasonably be expected to operate as baseload power plants (i.e., operate around the clock). The analysis utilized data forecasted for Japan to evaluate the supply and demand conditions and power system resource mix forecasted

[20] *Id.*

for 2030, along with the country electric load shape presented in the Power Grid Study.[21]

Table 4 (below) summarizes the analysis by comparing total derated baseload capacity to the minimum load hour level forecast for 2030 during each season.

- The total derated baseload capacity includes renewable power, nuclear, and coal-fired power capacity. The capacity is adjusted (or derated) to reflect seasonal availability and operational capabilities of these plants.[22]
- The minimum electric load level is calculated with an estimate of peak electric demand for 2030 based on the forecasted supply of derated capacity required to meet the peak annual electrical demand plus a 10% reserve margin, along with the load shape statistics reported in the Power Grid Study.

Table 4 demonstrates that the minimum or lowest electrical demand level during the seasonal peak and off-peak periods is forecast to be higher than the total derated baseload capacity of the Japan power system in 2030. This analysis indicates that coal-fired power plants can be expected to operate primarily as baseload facilities, i.e. operating all hours of the day. As such, the coal-fired power plants are not expected to operate any more if the price of coal falls.[23]

Table 4: Comparison of Minimum Electrical Demand to Derated Baseload Capacity (Japan – 2030)

	Japan			
	Winter		Summer	
	Peak	Off-Peak	Peak	Off-Peak
Minimum Electrical Demand Hour (GW)	144	109	138	103
Total Derated Baseload Capacity (GW)	112	91	115	93
Difference	32	19	23	9

[21] International Energy Agency. World Energy Outlook 2015. "Japan-Electrical Capacity, New Policies Scenario." November 2015, p. 614.

[22] No adjustment was made to account for unplanned outages, which could further lower the derated baseload capacity.

[23] This analysis does not differentiate between coal-fired power plants using different types of coal, such as subbituminous and bituminous coal.

The following discussion provides anecdotal evidence of how coal-fired power plants operate in Japan. Japan recently characterized coal-fired power plants as a "baseload power source" in the country's most recent long-term energy plan. Specifically, Japan defined "baseload power source" as a "power source that has a low operating cost and can stably generate electricity and continuously operate night and day." It is desirable that baseload power sources account for about 60% of all the power sources in Japan (in terms of output), the bureau announced.[24] In addition, the bureau said that geothermal, hydroelectric, nuclear, and coal-fired power plants are the base load power sources in Japan.[25] At the fourth meeting of the subcommittee, the bureau said the desirable composition ratio of geothermal and hydroelectric power plants combined was about 10.5%, meaning that the desirable composition ratio of nuclear and coal-fired power plants combined is about 50%.[26]

In setting energy policy goals, Japan's Fourth Strategic Energy Plan identifies the energy sources' characteristic with the goal of achieving energy supply structure with stable supply, low cost, and environmental acceptability. The energy sources' definitions include: [27]

1. Baseload Power Sources: Power output can be operated stably and at low cost regardless of day and night. Examples include geothermal energy, ordinary hydropower (run-of-river type), nuclear energy, and coal.
2. Intermediate Power Source: Power output can be produced at low cost next to baseload power source, and can respond quickly and flexibly to the situation of electricity demand. One example is natural gas.
3. Peaking Power Source: Power output can respond quickly and flexibly to the situation of electricity demand in spite of high cost. Examples include oil and pumped-storage hydropower.

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[24] Japan's Ministry of Economy, Trade and Industry (METI). Fifth meeting of the Long-term Energy Supply and Demand Outlook Subcommittee, Strategic Policy Committee, Advisory Committee for Natural Resources and Energy. March 30, 2015.
http://techon.nikkeibp.co.jp/english/NEWS_EN/20150405/412700/?ST=msbe

[25] Japan's hydroelectric power facilities are pumped storage.
http://www.fepc.or.jp/english/energy_electricity/location/hydroelectric/index.html

[26] http://techon.nikkeibp.co.jp/english/NEWS_EN/20150405/412700/?ST=msbe

[27] Fourth Strategic Energy Plan. Government of Japan, Ministry of Economy Trade and Industry. April 2014, p. 21.

South Korea

An economic analysis was conducted to determine if the South Korean coal fleet anticipated to be operating in 2030 may reasonably be expected to operate as baseload power plants (i.e., operating around the clock). The analysis utilized data forecasted for South Korea to evaluate the supply and demand conditions and power system resource mix forecasted for 2030, along with the country electric load shape presented in the Power Grid Study.[28]

Table 5 (below) summarizes the analysis by comparing total derated baseload capacity to the minimum load hour level forecast for 2030 during each season.

- The total derated baseload capacity includes renewable power, nuclear, and coal-fired power capacity. The capacity is adjusted (or derated) to reflect seasonally availability and operational capabilities of these plants.[29]
- The minimum load level is calculated with an estimate of peak demand for 2030 based on the forecasted supply of derated capacity required to meet the peak annual electrical demand plus a 10% reserve margin, along with the load shape statistics reported in the Power Grid Study.

Table 5 demonstrates that the minimum or lowest electrical demand level during the seasonal peak and off-peak periods is forecast to be higher than the total derated baseload capacity of the South Korean power system in 2030, with a small exception during the lowest load hour in the summer season.[30] This analysis indicates that coal-fired power plants can be expected to operate as baseload facilities for the vast majority of time, i.e. operating all hours of the day. As such, these coal-fired power plants will only operate a very small amount more, if any, when coal prices decrease.[31]

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[28]South Korean Ministry of Trade, Industry and Energy. "The 7th Basic Plan for Long-term Electricity Supply and Demand (2015 - 2029).” July 2015, pp. 42, 77. Data for 2029 was used as a proxy for 2030, as 2029 is the last forecast year.

[29] No adjustment was made to account for unplanned outages, which could further lower the derated baseload capacity.

[30] If the third lowest load hour is used for the summer off-peak period, the minimum electrical demand exceeds the derated baseload capacity. A coal-fired power plant is not typically operated in a manner that would shut down the plant for a single hour or two during the day.

[31] This analysis does not differentiate between coal-fired power plants using different types of coal, such as subbituminous and bituminous coal.

Table 5: Comparison of Minimum Electrical Demand to Derated Baseload Capacity (South Korea – 2030)

	South Korea			
	Winter		Summer	
	Peak	Off-Peak	Peak	Off-Peak
Minimum Electrical Demand Hour (GW)	98	90	83	77
Total Derated Baseload Capacity (GW)	82	79	82	79
Difference	17	11	2	(2)

The following discussion provides anecdotal evidence of how coal fired power plants operate in South Korea. According to the Energy Information Administration, baseload generation in South Korea stems mainly from coal and nuclear power, while peak demand is generally met by the country's liquefied natural gas (LNG) imports.[32] In addition, the South Korean power providers recognize that natural gas-fired power plants have operated as the marginal units in the past and are expected to do so in the future. Under South Korea's current power policy, coal-fired power plants and nuclear reactors run by state power utility (Korea Electric Power Corp., or KPX) provide electricity as "baseload generators." When power demand grows, KPX raises its power purchases from state-run and private generators that use more expensive fuel like LNG or oil.[33]

Taiwan

An electric load shape was not available for Taiwan to determine if the coal fleet anticipated to be operating in 2030 in Taiwan may reasonably be expected to operate as baseload power plants (i.e., operating around the clock). However, evidence suggests that the minimum or lowest electrical demand level for Taiwan is likely to be higher than the total derated baseload capacity. Comparing economic statistics from Japan and

[32] See https://www.eia.gov/beta/international/analysis.cfm?iso=KOR

[33] Dismal outlook for LNG in S Korea's power market as coal, nuclear gain favor: KPX. Platts. March 20, 2015. See http://www.platts.com/latest-news/natural-gas/seoul/dismal-outlook-for-lng-in-s-koreas-power-market-27227039 Electricity reserves fell to 5.2% in 2012 as several nuclear reactors were taken offline, while operating rates of gas-fired plants had jumped to 64.7%. Since then, however, electricity reserves have been on the rise to 5.5% in 2013 and 11.5% in 2014. "Operating rates of gas-fired plants are expected to further slip to 44.8% this year, 33.9% next year, 23.7% in 2019 and as low as 16.8% in 2022," Yoo said. Yoo attributed the lower rates to South Korea aggressively trying to minimize fuel costs.

Taiwan indicate that Taiwan has a relatively higher minimum electric load than Japan compared to the peak electric load.[34] In addition, the derated baseload capacity for Taiwan (including coal-fired capacity) is approximately the same percentage of the total system capacity as Japan.[35] Therefore, it is reasonable to expect that Taiwan's coal power plants are baseload in nature.

Conclusion:

The evaluation of electrical load shapes and coal use in baseload plants in Asian countries discussed above demonstrates that the elasticity of demand for coal in those countries is likely low. This conclusion is supported by the economic characteristics of their electricity generation portfolios, the electrical load shapes in these countries, and how these countries reliability operate their power systems. This means that coal-fired power plants can reasonably be expected to operate continuously around the clock. As such, they have limited opportunity to operate more if coal prices fall for various reasons, including as a result of the operation of the Project. Therefore, based on the analysis above, the Project is unlikely to cause coal-fired power plants to displace natural gas-fired power plants to any material degree.

C. Evaluation of Potential Induced Coal Consumption in Asia as a Substitute for other Fuel Types in Power Generation - SRMC

An economic analysis of the short-run marginal cost (SRMC) of coal-fired power plants relative to other competing fuels (i.e. natural gas-fired power plants) in the downstream power markets in the Pacific Basin countries could be studied to evaluate the potential impact of a forecasted change in global coal prices resulting from the Project on the SRMC of the fuels in each country's wholesale power systems. The purpose of the analysis is to evaluate the potential impact of the lower coal price from the Project on the dispatch rank order of the power plants in the system, to discern if the plants would

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[34] As discussed above, Taiwan has a very large component of its electricity consumed by industrial customers. For example, in 2014, 53.8% of the electricity consumed occurred by industrial customers, which is even higher than Japan and Korea. Energy Supply and Demand Situation of Taiwan in 2014. Ministry of Economic Affairs of the Republic of China (MOEA), p. 7. See https://web3.moeaboe.gov.tw/ECW/english/content/wHandMenuFile.ashx?menu_id=1551

[35] Energy Supply and Demand Situation of Taiwan in 2014. Ministry of Economic Affairs of the Republic of China (MOEA). See https://web3.moeaboe.gov.tw/ECW/english/content/wHandMenuFile.ashx?menu_id=1610

operate more often (i.e., likely to be dispatched more frequently in advance of natural gas-fired power plants), thereby inducing coal demand and increasing GHG emissions, and evaluate the relative elasticity/inelasticity for the Pacific Basin study region.

Least-cost dispatch, also referred to as economic dispatch, is the power system approach to dispatching power plants (i.e., turning them on) over the course of a day based on each generating unit's SRMC. SRMC is the economic cost metric used to identify the rank order of the power plants to conduct the economic operations of a power system, with the lowest SRMC plants being dispatched first and higher SRMC plants being dispatched as needed, up until the point where supply meets demand. SRMC is the cost that accrues when a power plant produces more electricity. SRMC excludes any fixed costs from the construction, operation, and maintenance of the power plant.

The least-cost dispatch approach is necessary because electricity demand, also referred to as electrical load or consumption, varies over the days of the week and the hours of the day. The pattern of electrical consumption is generally low in the middle of the night, slowly rising in the morning, peaking in the middle of the day, and falling in the evening hours.[36] As energy consumption (i.e., demand) rises over the day, additional power plants are turned on to increase the supply of power. Similarly, as energy demand falls, power plants are turned off. Power system operations are sequenced to turn on the lowest-cost units first and only operate higher-cost units as needed.

Table 6 (below) summarizes the economic analysis of the SRMC of coal-fired power plants and natural gas-fired power plants in South Korea, Japan, and Taiwan.[37] The analysis was conducted for 2015 and 2030. The SRMC includes the delivered fuel cost and non-fuel variable operations and maintenance costs for coal- and natural gas-fired power plants' components. The SRMC were compared under a range of future forecasted delivered fuel prices and a range of efficiency ratings (also referred to as heat rates) to capture different power plant performance levels.[38]

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[36] The pattern of electrical consumption is referred to as an electrical load shape.

[37] We did not evaluate the potential induced coal consumption from bituminous coal, based on the analysis of EVA that demonstrates that subbituminous coal does not economically compete with bituminous coal. We assume no substitution for lower-cost nuclear power, which is continuously operated and has lower short-run marginal cost.

[38] A more efficient power plant is able to use lower quantities of coal (tons or British Thermal Units - BTUs) in order to produce the same quantity of electricity (kwhs). Thus, higher-efficiency power plants observe higher performance. An efficiency rating is reported on a percentage basis, with higher efficiencies representing superior performance. The power industry also relies on another measure of efficiency, referred to as the heat rate, which represents the amount of energy (BTU) used by a power plant to generate a single unit of power. This BTU/kwh metric represents the quantity of input fuel (BTU)

The results of the analysis show that the SRMC of coal-fired power plants is appreciably lower than the SRMC of natural gas-fired power plants. For example, in 2030 for Japan, the SRMC for subbituminous coal ranges from $49 - $64 per MWH, substantially below the SRMC for natural gas-fired power plants, which ranges from $101-$133 per MWH. Since coal-fired power plants have lower SRMC, any reduction in coal prices resulting from the Project will not cause the coal-fired power plants to be dispatched ahead of natural-gas fired power plants, and therefore no increase in coal demand will result.

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required to produce a single unit of power (kwh). Lower heat rates signify higher unit performance because less BTU of fuel is needed to produce a unit of power.

Table 6: Short Run Marginal Cost (SRMC): Comparison of Coal and Natural Gas Baseload Power Plants in Japan, South Korea, and Taiwan for 2015 and 2030[39]

Country/Date	Fuel & Plant Type	High Heat Rate (a)	Low Heat Rate (a)	Delivered Fuel Cost (b)	Non Fuel Variable O&M Cost (c)	Total SRMC Cost ($/MWh)	
		BTU/kwh	BTU/kwh	$/MMBTU	$/MWH	Low Heat Rate	High Heat Rate
2015							
Japan	Subbituminous Coal	7,935	9,749	$2.9	$15.0	$38	$43
Japan	Natural Gas (CC)	6,430	7,050	$11.2	$3.0	$75	$82
South Korea	Subbituminous Coal	7,935	9,749	$2.9	$6.6	$29	$35
South Korea	Natural Gas (CC)	6,430	7,050	$11.2	$5.0	$77	$84
Taiwan	Subbituminous Coal	7,935	9,478	$2.7	$2.5	$24	$29
Taiwan	Natural Gas (CC)	6,430	7,050	$10.7	$5.0	$74	$80
2030							
Japan	Subbituminous Coal	7,935	9,749	$4.3	$15.0	$49	$56
Japan	Subbituminous Coal	7,935	9,749	$5.0	$15.0	$55	$64
Japan	Natural Gas (CC)	6,430	7,050	$15.3	$3.0	$101	$111
Japan	Natural Gas (CC)	6,430	7,050	$18.5	$3.0	$122	$133
South Korea	Subbituminous Coal	7,935	9,749	$4.3	$6.6	$40	$48
South Korea	Subbituminous Coal	7,935	9,749	$5.0	$6.6	$46	$55
South Korea	Natural Gas (CC)	6,430	7,050	$15.3	$5.0	$103	$113
South Korea	Natural Gas (CC)	6,430	7,050	$18.5	$5.0	$124	$135
Taiwan	Subbituminous Coal	7,935	9,478	$4.1	$2.5	$35	$41
Taiwan	Subbituminous Coal	7,935	9,478	$4.8	$2.5	$41	$48
Taiwan	Natural Gas (CC)	6,430	7,050	$14.8	$5.0	$100	$109
Taiwan	Natural Gas (CC)	6,430	7,050	$18.0	$5.0	$121	$132

[39] a.) Energy Information Administration, International Energy Outlook 2016. Dong, N. and Baruya, P. IEA "Coal and Gas Competition in Power Generation in Asia." February 2015; b) International Energy Agency, World Energy Outlook 2015. Low oil price scenario and New Policies Scenario: NERA Economic Consulting, Macroeconomic Impacts of LNG Exports from the United States. 2012, p. 87, and Energy Ventures Analysis; c) Non Fuel Variable O&M = Variable Operations and Maintenance. Dong, N. and Baruya, P. IEA "Coal and Gas Competition in Power Generation in Asia." February 2015, and EIA, IEO 2016. Note the analysis reflects nominal dollars.

For these reasons, a reduction in coal prices that may result from the Project will not generally cause coal-fired power plants to operate more frequently in Japan, South Korea, and Taiwan, and is not likely to induce greater demand for coal. Therefore, the elasticity of demand for coal in Japan, South Korea, and Taiwan can reasonably be expected to be very low.

This lack of anticipated competition between coal- and natural gas-fired power plants in Japan, South Korea, and Taiwan is different than the U.S. experience. Recent evidence shows that coal-fired power plants are frequently competing with natural gas-fired power plants in U.S. wholesale power markets. This result occurs because of the relatively comparable SRMC that results from the very low costs of delivered coal and natural gas to U.S. power plants due to the abundant natural resources of both coal and natural gas, as well as reasonably low cost methods to transport the fuel within the U.S.[40] Japan, South Korea, and Taiwan have moderate costs of delivered coal (due to imports of coal from regional sources) and reasonably economic vessel transportation. However, these countries experience very high costs associated with delivered natural gas because they lack local natural resources and must rely on highly-complicated, capital-intensive, and costly processes to transport natural gas across long distances over the ocean. (This process requires liquefying natural gas from the source country, transporting it, and completing a regasification process at the destination.) All of these steps substantially increase the cost of the delivered natural gas to Japan, South Korea, and Taiwan.

D. Evaluation of Retail Customer Electricity Rates for Selected Countries in the Pacific Basin

The previous analysis demonstrates that coal-fired power plants will not likely operate more frequently, nor create an induced demand for coal (i.e. limited elasticity of demand responsiveness is likely). However, a reduction in the price of coal fuel may result from the Project. The following analysis evaluates the impact of the reduced coal fuel cost on the retail electricity rates in Japan and South Korea to determine if increased electricity demand can be expected from retail customers. Specifically, this analysis will evaluate if the lower retail electricity rates that could result from lower fuel costs would be likely to impact consumption of electricity (e.g., causing consumers to turn on more

[40] This competition between coal-fired and natural gas-fired power plants indicates that natural gas-fired power generation substitutes frequently for coal-fired power plants in the U.S. and can be expected to continue to do so in the future, particularly when a coal price decline results from the Project. Medium-Term Outlook for US Power: 2015 = Deepest De-carbonization Ever. *Bloomberg New Energy Finance.* April 8, 2015.

lights, run more appliances, etc.). Due to data limitations, no analysis was completed for Taiwan.

The following economic analysis was conducted to study the impact of a small reduction in coal prices from the Project on the final consumer electric rate in South Korea and Japan to evaluate the relative elasticity/inelasticity in demand. Specifically, an analysis of the total electricity revenues associated with the ultimate customers' (i.e., residential and industrial customers') consumption of electricity in each Asian country was conducted to determine the impact of a small change in the price of coal from the Project on the final retail purchase price charged to ultimate customers.

The retail price of electricity includes many charges which can generally be grouped into asset categories. These categories include: power generation facilities, transmission and distribution facilities, and other fees associated with promoting policy or other initiatives. These categories include capital expenditures, such as power plants and transmission lines, operational and maintenance expenses associated with labor and equipment, financing costs, administrative charges, and potentially a return on investment. The utility industry is a highly capital-intensive industry and therefore incurs substantial costs in providing electricity service to customers.

Japan

Table 7 (below) presents the results of the analysis of retail electricity rates for Japan. It shows that coal fuel is expected to comprise just 3.57% of the total electricity revenue forecast for Japan in 2030.

A 5% decrease in coal fuel prices could potentially result from the Project[41] which would result in a less than 2/10ths of 1 percent decrease (specifically .17%) in the total retail electricity revenue/rate to Japanese purchasers of electricity.[42] Therefore, for a $100 electricity bill, a 17-cent reduction is estimated to result from a 5% decrease in coal fuel prices.

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[41] The change in price of coal is anticipated to be negligible because the 44 MMT expected to be exported by the Project is a very small percentage of the hundreds of millions of tons of subbituminous coal in any given year for the global market. An illustrative 5% coal price decrease is used in this analysis, because the Draft EIS did not provide information on the coal price impact resulting from the Project. A smaller coal price decline will have even less impact than discussed in this memo. Draft EIS. *The SEPA Coal Market Assessment Technical Report*, p. 4-11.

[42] This analysis is conservative because it reduces all coal fuel-related costs, even fuel costs for coal types that are not impacted by the Project, and ancillary costs associated with the coal fuel, including transportation.

Table 7: Retail Customer Electricity Rates Analysis: Japan

	Industry	Household	Total Revenue
Price (USD/kWh)			
2013	$0.174	$0.242	
2030	$0.265	$0.368	
2030 Estimated Total Electricity Values			
Consumption (kWh)	251,136,000,000	729,864,000,000	981,000,000,000
Revenues (USD)	$ 66,491,163,513	$268,759,002,519	$335,250,166,033
2030 Estimated Coal Values			
Coal Generation (kWh)	65,295,360,000	189,764,640,000	255,060,000,000
Coal Generation Revenues (USD	$7,740,830,223	$22,496,787,837	$30,237,618,060
Fuel	$3,060,328,228	$8,894,078,912	$11,954,407,140
Percent Coal Fuel			3.57%
Coal Revenue (with 5% decrease)			$11,356,686,783
Revised Total Revenue			$334,652,445,676
Percent Coal Fuel (with 5% decrease)			3.39%
Impact of 5% decrease in coal fuel cost			-0.18%

Sources:

[A] Assumed yearly inflation from 2013 to 2030.

[B-C] "The Best Energy Mix for Japan." Institute of Energy Economics, Japan. June 4, 2015; pg. 5.

[D-E] "Japan and Korea Energy-Intensive Industries Share of Energy Consumption" Electrical Demand Memo MBT, pg 5

[F-G] "Japan's Likely 2030 energy mix: more gas and solar." Whitepaper, Bloomberg New Energy Finance. June 2, 2015; p

[H] JPY to USD conversion rate on May 13, 2013, sourced from www.oanda.com.

[I] "The Best Energy Mix for Japan." Institute of Energy Economics, Japan. June 4, 2015; pg. 21.

The economic analysis demonstrates that the impact of a small decline in the price of coal has a de minimis impact on the overall retail electricity bill, which is not likely to change consumer behavior. It is also not likely to materially increase electricity consumption and therefore increase coal-fired power generation. For these reasons limited induced demand for coal is likely, and a highly inelastic demand responsiveness is reasonable to assume.

South Korea

Table 8 (below) presents the results of the analysis of retail electricity rates for South Korea. It shows that coal fuel comprises approximately 12.58% of the total electricity revenue for South Korea.

Applying a 5% decrease in coal fuel prices that could potentially result from the Project[43] would result in approximately 6/10 of one percent decrease (specifically .63%) in the total retail electricity revenue/rate to South Korean purchasers of electricity.[44] Therefore, for a $100 electricity bill, a 63-cent reduction is estimated to result from a 5% decrease in coal fuel prices.

[43] As noted above with Japan, illustrative 5% coal price decrease is used in this analysis because the Draft EIS did not provide information on the coal price impact resulting from the Project. A smaller coal price decline will have even less impact than discussed in this memo. Draft EIS. *The SEPA Coal Market Assessment Technical Report*, p. 4-11.

[44] As noted above with Japan, this analysis is conservative, because it reduces all coal fuel related costs, even fuel costs for coal types that are not impacted by the Project, and ancillary costs associated with the coal fuel, including transportation.

Table 8: Retail Customer Electricity Rates Analysis: South Korea

	Industry	Household		Total Revenue
Price (USD/kWh)				
2007	$0.046	$0.068		
2035	$0.101	$0.149		
2035 Estimated Total Electricity Values				
Consumption (kWh)	314,976,000,000	501,024,000,000		**816,000,000,000**
Revenues (USD)	$ 31,807,473,158	$ 74,792,757,583	**$**	**106,600,230,742**
2035 Estimated Coal Values				
Coal Generation (kWh)	123,155,616,000	195,900,384,000		**319,056,000,000**
Coal Generation Revenues (USD)	$ 13,088,825,155	$ 20,820,048,304		**33,908,873,460**
Fuel	$ 5,174,651,806	$ 8,231,181,888		**13,405,833,693**
Percent Coal Fuel				12.58%
Coal Revenue (with 5% decrease)				12,735,542,009
Revised Total Revenue				$105,929,939,057
Percent Coal Fuel (with 5% decrease)				12.02%
Impact of 5% decrease in coal fuel cost				-0.63%

Source

[A] Korea Energy Master Plan: Outlook & Policies to 2035, pg. 42

[B] http://www.inflation.eu/inflation-rates/south-korea/historic-inflation/cpi-inflation-south-korea.aspx

[C] Inflation rate based on A. and B.

[D] "o5. -Chinese-Taipei1" powerpoint. pg. 27
2007 exchange rate based on http://www.x-rates.com/average/?from=TWD&to=EUR&amount=1&year=2007

[E] Industry Price if 2007 industry:household price ratio is the same

[F] "o5. -Chinese-Taipei1" powerpoint. pg. 27
2007 exchange rate based on http://www.x-rates.com/average/?from=TWD&to=EUR&amount=1&year=2007

[G] "The Best Energy Mix for Japan." Institute of Energy Economics, Japan. pg. 5

[H] "Japan and Korea Energy-Intensive Industries Share of Energy Consumption" Electrical Demand Memo MBT, pg. 3

[I] Korea Energy Master Plan: Outlook & Policies to 2035, pg. 46

[J] "The 7th Basic Plan for Long-term Electricity Supply and Demand (2015-2029). pg. 6.

[K] www.oanda.com

The economic analysis demonstrates that the impact of a small decline in the price of coal has a de minimis impact on the overall retail electricity bill. This is not likely to change consumer behavior and increase electricity consumption and therefore increase

coal-fired power generation. For these reasons limited induced demand for coal is likely, and a highly inelastic demand responsiveness is reasonable to assume.

E. Evaluation of the Differences in Efficiencies of Coal-Fired Power Plants in the U.S. and Selected Countries in the Pacific Basin from the Project.

The Draft EIS does not address the differences in efficiencies between existing and planned power plants in the U.S. Japan, South Korea, and Taiwan that are expected from the Project (over the course of its operating life) to determine and the impact of efficiencies on the total coal consumed and resulting GHG emissions (i.e. will a power plant operating in the selected countries in the Pacific Basin produce more or less GHG emissions per unit of electricity produced).

As discussed in more detail below, the operational efficiency of the selected Asian countries' fleets of coal-fired power plants is expected to be superior to the U.S. coal-fired power plant fleet during the operating life of the Project. The reason is that the Asian countries' coal-fired power plant fleet comprises newer plants equipped with better technological capabilities that require a lower quantity of coal to produce a single unit of power (kilowatt hour or kwh). As such, on average an Asian country's coal-fired power plant that burns Powder River Basin (PRB) coal produces less GHG emissions than a U.S. coal-fired power plant, because the Asian country's coal-fired power plants produce more power per unit of coal input (BTUs).

Said differently, an offsetting reduction in coal consumption and emissions will result in Asia as a result of the Project because the Project will cause less PRB coal to be consumed in the U.S. That same coal being consumed in selected Asian countries will produce greater quantities of power compared to if it had been burned in the U.S.

Coal-Fired Power Plant Capacity by Type

In order to understand the relative efficiency of the coal-fired power plant fleets in selected Asian countries compared to the U.S., a review of the types of power plants in each county's existing fleet of coal-fired power plants is required. Table 9 (below) shows MW capacity estimates for 2015 for U.S. and selected Asian countries' coal-fired power plant fleets by type of plant, based on reports from the International Energy Agency (IEA). This table shows that the U.S. coal-fired power plant fleet is relatively less efficient than the newer fleet in selected Asian countries, particularly in Japan and South Korea. The majority of coal-fired power plants in South Korea and Japan are

either supercritical or ultra-supercritical (based on IEA estimates), and these power plants are generally newer due to the growing economies that increased electricity demand. Specifically, as Table 9 shows, within South Korea and Japan approximately 73% and 74%, respectively, of the coal-fired power plant fleets are supercritical or ultra-supercritical technology. By comparison, only approximately 27% of the U.S.'s coal-fired power plant fleet is considered either supercritical or ultra-supercritical technology.

Table 9: Capacity of Coal-Fired Power Plants by Type of Plant: U.S. and Selected Asian Countries[45] (2015 Estimate)

Country	Subcritical	Supercritical	Ultra-supercritical	Supercritical and Ultra-supercritical
US	246,832	89,503	672	337,007
China	531,384	173,549	92,653	797,586
South Korea	7,190	12,600	6,915	26,705
Japan	10,939	19,097	11,500	41,536
Percentage of Total (%)	**Subcritical**	**Supercritical**	**Ultra-supercritical**	**Supercritical and Ultra-supercritical**
US	73%	27%	0.2%	27%
China	67%	22%	12%	33%
South Korea	27%	47%	26%	73%
Japan	26%	46%	28%	74%

Japan, South Korea, and China continue to add higher efficiency coal-fired power plants that are supercritical and ultra-supercritical power plants to their power systems. This trend is likely to continue to increase the overall percentage of the higher efficiency power plants in the selected Pacific Basin countries compared to the U.S., because very few new coal-fired power plants are expected to be built in the U.S.

[45] Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014. US, p 76; China, p 36; South Korea, p 70; Japan, p 51. http://www.usea.org/sites/default/files/072014_Upgrading%20the%20efficiency%20of%20the%20world's%20coal%20fleet%20to%20reduce%20co2%20emissions_ccc237.pdf

Coal-Fired Power Plant Efficiency Ratings

To compare the relative efficiency of the U.S. coal-fired power plant fleet to the selected Pacific Basin countries, the following table was developed to summarize efficiency ratings associated with different types of coal power plants. Table 10 (below) reports the efficiency rating estimates and heat rates by the type of coal-fired power plant for the coal-fired power plant fleets in the U.S. and the selected Pacific Basin countries, as reported by the IEA.[46]

Table 10: Efficiency Rating/Heat Rate for Coal-Fired Power Plants U.S. and Selected Asian Countries [47]

Country	Efficiency			Heat Rate		
	Subcritical	Supercritical	Ultra-Supercritical	Subcritical	Supercritical	Ultra-Supercritical
US	33%	38%	43%	10,339	8,979	7,935
Japan	35%	40%	43%	9,749	8,530	7,935
South Korea	35%	40%	43%	9,749	8,530	7,935
China	36%	40%	43%	9,478	8,530	7,935

An efficiency rating, which is reported on a percentage basis, represents the performance of the power plant such that a higher efficiency indicates superior performance. A more efficient power plant is able to use lower quantities of coal (i.e., tons or BTUs) in order to produce the same quantity of electricity (i.e., kwhs). Thus, higher efficiency power plants observe higher performance. The power industry also

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[46] These efficiency ratings are based on the reporting by an IEA study and represent general efficiency ratings for each country and each type of plant based on numerous other research and studies. Actual operational performance can vary for any given power plant in any given country. In addition, standardization of power plant efficiencies and reporting is limited for a variety of reasons. Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014, pp. 18-9. http://www.usea.org/sites/default/files/072014_Upgrading%20the%20efficiency%20of%20the%20world's%20coal%20fleet%20to%20reduce%20co2%20emissions_ccc237.pdf

[47] Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014, p. 14. http://www.usea.org/sites/default/files/072014_Upgrading%20the%20efficiency%20of%20the%20world's%20coal%20fleet%20to%20reduce%20co2%20emissions_ccc237.pdf

relies on another measure of efficiency, referred to as a heat rate, which represents the amount of energy (BTU) used by a power plant to generate a single unit of power (BTU/kwh). This metric represents the quantity of input fuel (BTU) required to produces a single unit of power (kwh). A lower heat rate indicates a superior performance, because fewer BTUs of fuel are needed to produce a single unit of power.

Table 10 indicates the following:

- U.S. coal-fired power plants are less efficient than those in the selected Asian countries, even for the same technology type.
- The efficiency rating for subcritical coal–fired power plants is 33% for the U.S., and ranges from 35-36% for the selected Asian countries.
- The efficiency rating for supercritical coal–fired power plants is equal to 38% for the U.S., compared to 40% for the selected Asian countries.
- All countries have the same efficiency rating for ultra-supercritical coal plants (equal to 43%).

The weighted average heat rate of the coal-fired power fleet can be calculated for each country by analyzing the efficiency rating statistics reported by the IEA for each type of coal-fired power plant in each country, along with the mix type of plants. Table 11 (below) reports the weighted average heat rate by type of coal-fired power plant for the U.S. and selected Asian countries based on proportion of coal-fired power plant capacity technologies.

Table 11: Weighted Average Heat Rate for the U.S. and Selected Asian Countries [48]

Country	Item	Subcritical	Supercritical	Ultra-supercritical	Weighted Average	Percent Difference From U.S.
US	MW %	73.2%	26.6%	0.2%		
	Heat Rate	10,339	8,979	7,935	9,973	
Japan	MW %	26.3%	46.0%	27.7%		
	Heat Rate	9,749	8,530	7,935	8,686	-15%
South Korea	MW %	26.9%	47.2%	25.9%		
	Heat Rate	9,749	8,530	7,935	8,704	-15%
China	MW %	66.6%	21.8%	11.6%		
	Heat Rate	9,478	8,530	7,935	9,092	-10%

[48] Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014. Rates: US, p. 76; China, p. 36; South Korea, p. 70; Japan, p 51. Efficiencies, p. 19.

Table 11 shows that on average the U.S. fleet of coal-fired power plants is approximately 15% less efficient than the South Korean and Japanese coal-fired power plant fleets. [49] This implies that on average the South Korean and Japanese coal-fired power plant fleets each consume 15% less coal to generate the same level of power than the U.S. Therefore, South Korean and Japanese coal-fired power plants will each emit approximately 15% less CO_2 to generate the same output level of power than the U.S. when burning PRB-originating coal.[50] This table also shows that the U.S. coal-fired power plant fleet is approximately 10% less efficient than the Chinese fleet.

The future coal-fired power plant fleet in Asia is expected to improve efficiency ratings as more supercritical and ultra-supercritical coal-fired power plants are added to the power system. [51] In South Korea and Japan, the vast majority of recently built coal-fired power plants use supercritical and ultra-supercritical technologies.[52]

A sensitivity analysis was conducted to estimate the potential efficiency ratings that selected Asian countries' coal-fired power plants might observe in the future as compared to the U.S. In Table 12 (below), the future efficiency of the selected Asian countries' coal-fired power plant fleets was assumed to be comprised of 50% supercritical and 50% ultra-supercritical coal-fired power plants. This analysis also assumed that the U.S. maintains the historical mix of types of plants currently operating today. If these shifts occur, the selected Asian countries coal-fired power plant fleet would consume 21% less coal to generate the same level of power than U.S., and consequently would emit approximately 21% less CO_2 to generate the same level of power than the U.S.[53]

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[49] This comparison appears conservative, as the Energy Information Administration reports the average operating heat rate for the entire fleet of U.S. coal plants as greater than 10,400 btu/kwh for all years since 2009. http://www.eia.gov/electricity/annual/html/epa_08_01.html

[50] Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014, p. 19.

[51] There is also the possibility that existing power plants would make efforts to improve the efficiency at existing power plants. This could occur in the Asian countries and the U.S.

[52] Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014. US, p. 76; China, p. 36; South Korea, p. 70; Japan, p. 51. http://www.usea.org/sites/default/files/072014_Upgrading%20the%20efficiency%20of%20the%20world's%20coal%20fleet%20to%20reduce%20co2%20emissions_ccc237.pdf

[53] Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014, p. 19.

Table 12: Sensitivity Analysis for Weighted Average Heat Rates: U.S. and Selected Asian Countries

(Assumes Selected Asian Countries Attain a 50% / 50% Mix of Supercritical/ Ultra-supercritical)[54]

Country	Item	Subcritical	Supercritical	Ultra-supercritical	Weighted Average	Percent Difference From U.S.
US						
	Mix %	73.2%	26.6%	0.2%		
	Heat Rate	10,339	8,979	7,935	9,973	
Japan						
	Mix %	0.0%	50.0%	50.0%		
	Heat Rate	9,749	8,530	7,935	8,232	-21%
South Korea						
	Mix %	0.0%	50.0%	50.0%		
	Heat Rate	9,749	8,530	7,935	8,232	-21%
China						
	Mix %	0.0%	50.0%	50.0%		
	Heat Rate	9,478	8,530	7,935	8,232	-21%

Taiwan

The previous tables do not directly summarize statistics for Taiwan. It appears that the current fleet of coal-fired power plants in Taiwan only burn bituminous coal, and if that is correct, Taiwan is not a likely potential buyer of PRB coal. However, if that is not the case (or circumstances change), and we assume that Taiwan's coal-fired power plant fleet mix includes subcritical, supercritical, and ultra-supercritical plants similar to China, the implication is that the U.S. coal-fired power plant fleet is approximately 10% less efficient than the current Taiwan coal-fired power plant fleet. This implies that on average, the Taiwan coal-fired power plant fleet would consume 10% less coal to generate the same level of power and produce 10% less GHG emissions, to the extent that PRB coal is delivered to Taiwan.

Furthermore, all currently proposed coal-fired power plants in Taiwan are ultra-supercritical coal plants.[55] As discussed above, these plants observe a heat rate

[54] A somewhat improved heat rate could occur for the U.S. if more subcritical power plants are retired as compared to supercritical.

approximately equal to 8,000 btu/kwh. If the future mix of coal plants in Taiwan approximates 50% supercritical and 50% ultra-supercritical technologies, and assuming the U.S. maintains the historical mix of types of plants currently operating today, then the Taiwan coal-fired power plant fleet will consume 21% less coal to generate the same amount of power, and these plants would emit approximately 21% less CO_2 than U.S. coal-fired power plants burning PRB coal.

The foregoing analysis of the relative efficiency of U.S. vs selected Asian countries' coal-fired power plants does not account for other factors that may affect emissions. These factors include whether there is perfect displacement (nothing gained or lost in the system from differences in transloading), transportation, heat content of coal, and others.

Potential for Further Advancements in Coal Plant Efficiency

Beyond the coal fleets discussed above, even more advanced coal plants are being developed. For example, an advanced ultra-supercritical coal plant being developed yields an efficiency of 50%, substantially improved from the supercritical and ultra-supercritical coal plants' efficiencies, which range from 38-43%.[56] In addition, efforts to develop carbon capture and sequestration (CCS) technology continues to be made and, if successful, coal plants with CCS observe the greatest reductions in CO_2 if utilized.[57] CCS technology is most suitable for larger, more efficient (i.e., younger) coal plants, which generally characterize the Asian power fleet as compared to the U.S. fleet.[58]

To the extent that the Asian countries rely on even more advanced coal plants, such as advanced ultra-supercritical coal plants, or apply CCS technology to its existing coal fleet through retrofitting or build new plants with this capability, and the U.S. does not do so to the same extent, the further efficiency-related benefits will result in less coal consumed in Asia and lower GHG emission per unit of power generated by a coal plant as compared to the U.S.

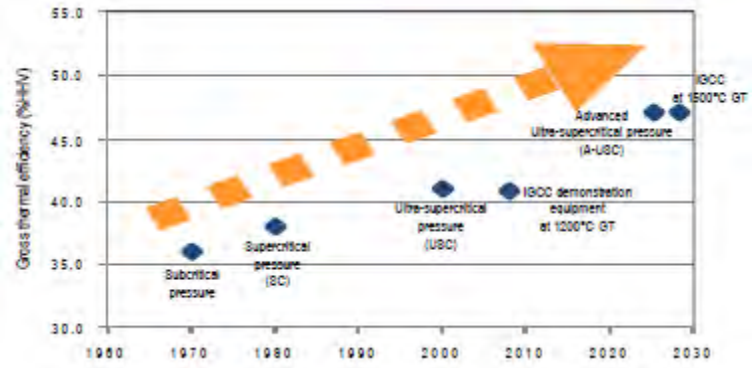
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[55] IEA. Clean Coal Centre – HELE Perspectives for Selected Countries. September 2015, pp 17-18.
[56] Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014, p. 19. Note: BTU/KWh, 1KWh = 3,412.
[57] Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014, pp. 13-14.
[58] Barnes, I. "Upgrading the Efficiency of the World's Coal Fleet to Reduce CO_2 Emissions." International Energy Agency (IEA). July 2014, pp. 13-14.

Japan

The Japanese government planning forecasts for the energy sector include a heavy reliance on coal-fired power plants, along with a commitment to adoption of "efficient" coal technologies such as ultra-supercritical coal plants for its reasoning.[59] Japan discussed its historical performance increasing the efficiency of coal-fired thermal power generation facilities in its recent long-term energy supply and demand outlook as presented in Table 13 (below). In addition, Japan expects continued efficiency improvements in the future.

Table 13: Improved Efficiency of Coal-Fired Thermal Power Generation Japan[60]



South Korea

According to South Korea's *7th Basic Plan for Long-term Electricity Supply and Demand* (BPE):

- "Power generation technology should be developed using super critical CO_2 in far-sighted ways in order to support small-scale generation facilities and enhance efficiency."[61]
- "Replacement of Aged Facilities with Environmentally-friendly Facilities – Greenhouse gas emissions are now under control by allowing the aged coal-fired power plants to be replaced within the capacity only when they were upgraded for the environment. The aged power plants here mean the power plants that have been operating over 40 years since construction."[62]

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[59] Bloomberg Energy Finance. ENERGY – JAPAN – WHITEPAPER. June 2, 2015.

[60] Report on Analysis of Generation Costs, Etc. for Subcommittee on Long-term Energy Supply-demand Outlook May 2015. Power Generation Cost Analysis Working Group, p. 47.

[61] *7th Basic Plan for Long-term Electricity Supply and Demand (2015-2029).* South Korea, The Ministry of Trade, Industry and Energy. July 24, 2015, p. 47.

[62] *Id.*, p. 12.

Appendix A

Evaluation of the Role of Government Planning and Economic Decision-Making for Building Coal-Fired Power Plants in South Korea, Japan, Taiwan and China, Draft EIS Assumptions

Evaluation of the Role of Government Planning and Economic Decision-Making for Building Coal-Fired Power Plants in South Korea, Japan, Taiwan and China, Draft EIS Assumptions

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Overview/Background

The following Appendix provides an evaluation of the GHG emissions impact analysis for the Millennium Coal export terminal project (Project) with respect to the government planning role and economic considerations in the decision-making to build coal-fired power plants in South Korea, Japan, Taiwan, and China. Specifically, this memo will evaluate whether the impact of the Project is likely to cause a change in the decision-making to build a coal-fired power plant given the government planning processes it relies upon and economic evaluations of building new coal-fired power plants.

The Draft EIS relies on demand elasticity assumptions to calculate an induced level of coal consumption in the Pacific Basin based on an estimated forecast of the change in delivered coal prices resulting from the Project. The demand elasticity assumption attempts to estimate the increased coal consumption in the Pacific Basin resulting from lower international coal prices associated with the Project's exportation of coal. The Draft EIS elasticity assumptions range from .1 to 1.2, and average .4. They are based on eight studies of energy-specific demand elasticities identified through a literature search and used as inputs to the Draft EIS scenarios.[63]

Because the Draft EIS relies on an assumed elasticity of demand to quantify the induced coal consumption, using a large range of elasticity of demand values, the Draft EIS does not address the specific extent to which a coal plant will be built in South Korea, Taiwan, and Japan as a result of the Project and the implications for the relative elasticity/inelasticity of coal. If coal demand is induced, it means that either more coal is used as a result of increased operational levels at existing coal plants, or additional coal consumption will result from operating newly-built coal-fired power plants.[64]

This memo will analyze whether the impact of the Project is likely to cause a change in the decision-making to build a new coal-fired power plant in South Korea, Japan,

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[63] Draft EIS. *The SEPA Coal Market Assessment Technical Report*, p. 4-11.

[64] Coal that is anticipated to be exported from the Project, such as PRB-originating coal, is used in coal-fired power plants to generate electricity.

Taiwan, and China, with respect to the role of government planning upon which it relies, as well as the economic decision-making in selecting what types of power plants to build when additional sources of power supply are needed.

Conclusion:

The government planning role in the decision-making of building new coal-fired power plants in South Korea, Japan, Taiwan, and China is substantial. The selection of the type of power plants is generally predetermined by government entities and implemented by the energy sector. In China and Taiwan, the government role in planning the selection of power plant types is substantial while in South Korea and Japan, the government role is significant with some modest level of flexibility and input by constituents. For these reasons a small change in the price of coal will not likely have an impact on government planning decisions to build new coal-fired power plants.

An analysis of the economic decision-making of building a new coal-fired power plant in South Korea, Taiwan, and Japan demonstrates that it is not likely to change due to a small change in the price of coal that may result from the operation of the Project. Coal-fired power plants are very large, capital-intensive projects, which can cost $1 billion to $2 billion or more depending on the size and technology. A small change in the price of coal has no impact on the total capital cost and a de minimis impact on the total annual capital and operating costs.

For these reasons, no new coal-fired power plants are likely to be built based on government planning or economic considerations as a result of the Project, which is evidence of a zero elasticity of demand (associated with newly built power plants). This Appendix is separated into two chapters to discuss different aspects of the decision-making associated with building coal-fired power plants. Chapter 1 discusses the government planning role, and Chapter 2 discusses the economic considerations.

Chapter 1: Evaluation of the Role of Government Planning in the Decision-Making for Building Coal-Fired Power Plants

Chapter 1 will analyze whether the impact of the Project is likely to cause a change in the decision-making to build a new coal-fired power plant in South Korea, Japan, Taiwan, and China, with respect to the role of government planning upon which it relies when additional sources of power supply are needed.

Description of the Government Planning within the Energy Sector

The following discussion provides a high-level overview of the planned nature and non-market features and characteristics of the South Korea, Japan, Taiwan, and China energy industries and economies. The energy industries in these countries exhibit non-market features in the forms of government interventions and reliance on planning-based decision-making within the energy industry. Specifically, these countries generally conduct long-term planning processes to set forth the future power supply and resource mix of electric generating plants for each country. These policies are dictated by broad government policy goals that evaluate market and non-market features and provide policy requirements for implementation.

South Korea

The government of South Korea is heavily involved in energy industry planning, including a role in decision-making regarding the types of power plants that will be built.

The South Korea Ministry of Trade, Industry and Energy (MTIE) conducts long-term energy planning and creates a Basic Plan for Long-Term Electricity Supply and Demand (BPE) pursuant to Article 25 of the Electricity Business Act (EBA), which requires a stable supply and demand of electricity. The BPE is announced biennially and is reviewed and released by the Electricity Policy Review Board pursuant to Article 15 of the Electricity Business Decree after the consultation among the Ministries, the report to the National Assembly Standing Committee, and the public hearing.

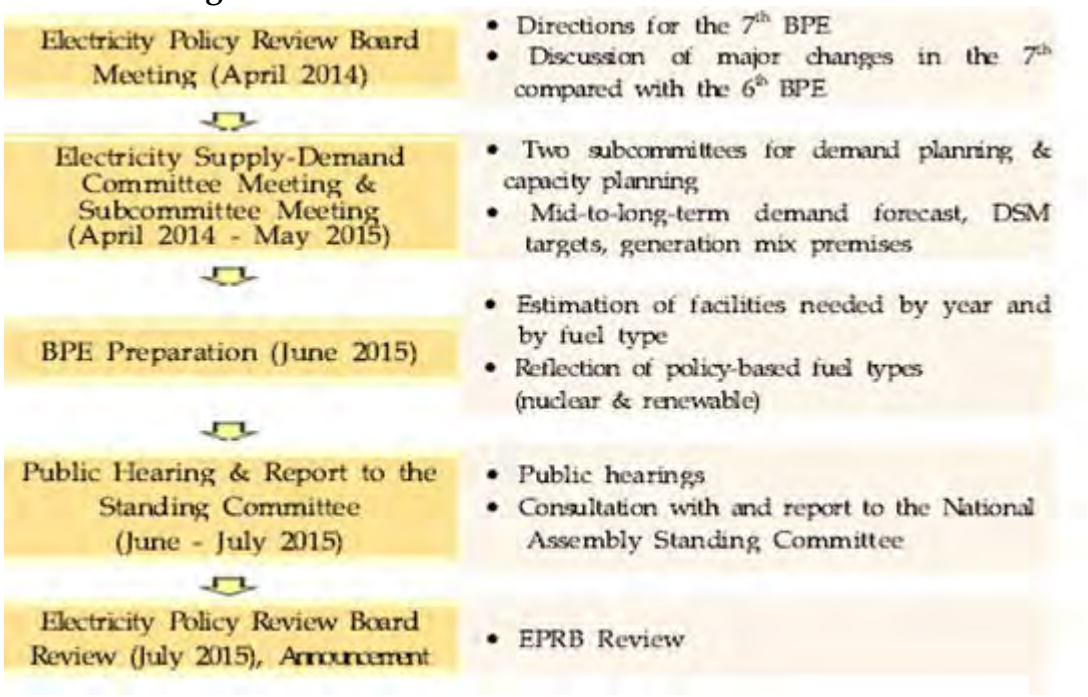
The most recent plan, which is referred to as the 7th BPE, outlines the structure of power generation and load capacity, and forecasts demand for the period from 2015-2029. The plan includes the development of a long-term outlook for electricity supply and demand; plans for generation facilities, transmission facilities, and transformation facilities; electricity demand management; and an evaluation of the previous BPE.[65] Demand forecasts are based on factors such as GDP growth, predicted weather and climate patterns, consumer trends, market utility rates, input prices, population growth, and other factors.[66] These forecasts create a path which policy makers use to dictate the growth rate in the energy sector and subsequently decide on a strategy for the energy mix necessary to meet forecasted demand.[67]

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[65] *7th Basic Plan for Long Term Electricity Supply and Demand (2015-2029).* South Korean Ministry of Trade, Industry and Energy. July 2015, p. 1.
[66] *7th BPE (2015-2029)* at p. 15.
[67] *Id. at* pp. 7-8.

Figure 1 (below) outlines the planning procedures for the South Korean long-term electricity supply and demand planning.

Figure 1: South Korea Planning Procedures for Long Term Electricity Supply and Demand Forecasting [68]



Each energy plan must evaluate the recent historical power generation capacity and energy mix and develop future goals to ensure that the necessary capacity is available to meet peak demand. Further, political objectives are built into the energy plans. For example, certain policy goals are set regarding the development of power generation technology with supercritical CO_2 capabilities and other efforts to reduce carbon emissions. The 7th BPE states: "Replacement of Aged Facilities with Environmentally-friendly Facilities: Greenhouse gas emissions are now under control by allowing the aged coal-fired power plants to be replaced within the capacity only when they were upgraded for the environment. The aged power plants here mean the power plants that have been operating over 40 years since construction."[69] Earlier, the 6th BPE focused on boosting total capacity through the use of coal and LNG plants.[70]

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[68] *Id. at* p 2.

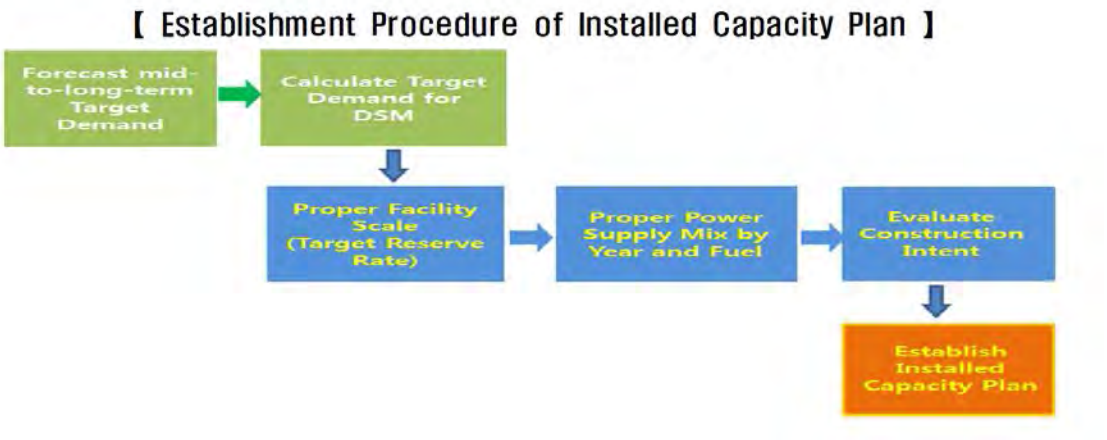
[69] *7th BPE (2015-2029) at* pp. 9, 12, 47.

[70] *6th Basic Plan for Long Term Electricity Supply and Demand (2013-2027).* South Korean Ministry of Knowledge Economy. February 2013, p. 32.

When additional generation capacity is deemed necessary, the MTIE conducts an assessment to determine the amount of additional capacity and the method by which that capacity will be delivered before tenders are disseminated to producers for construction of additional facilities. The final decisions are made by MTIE by awarding permits in line with the new generation capacity by year and by fuel.[71]

Figure 2 (below) outlines South Korea's planning procedures for making additions to power plant capacity.

Figure 2: South Korea's Planning Procedures for Power Plant Capacity Additions[72]



The primary power company operating in South Korea is the Korea Electric Power Corporation (KEPCO) which is a state-owned enterprise. The Korean Government and Korea Development Bank, also state owned, hold a 51.1% interest in KEPCO.[73]

The following Figure 3 sets forth the South Korea planned capacity outlook by fuel type.

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[71] According to the 7th BPE, "Intents for construction of thermal power plants were not surveyed because there was no need for new installations." Only one firm submitted an intention to construct two nuclear power plants. *7th Basic Plan for Long Term Electricity Supply and Demand (2015-2029).* South Korean Ministry of Trade, Industry and Energy. July 2015, pp. 24-25, 35.

[72] *7th Basic Plan for Long Term Electricity Supply and Demand (2015-2029).* South Korean Ministry of Trade, Industry and Energy. July 2015, p. 25.

[73] United States Securities and Exchange Commission Form 20-F Filing FY15. Korea Electric Power Corporation, p. 105.

Figure 3: South Korea's Planning Generation Mix Outlook[74]

7 Generation Mix Outlook

A. By Nominal Capacity

☐ Nationwide

[Unit: MW, %]

Year	Nuclear	Bituminous Coal	Anthracite	LNG	Oil	Pumped storage	Renewable	RDS	Total
2014	20,716	25,149	1,125	26,742	3,850	4,700	6,241	4,693	93,216
	22.2	27.0	1.2	28.7	4.1	5.0	6.7	5.0	100
2015	21,716	26,169	1,125	28,246	3,850	4,700	7,355	5,165	98,326
	22.1	26.6	1.1	28.7	3.9	4.8	7.5	5.3	100
2016	23,116	33,873	1,125	27,996	3,850	4,700	8,960	6,895	110,515
	20.9	30.6	1.0	25.3	3.5	4.3	8.1	6.2	100
2017	25,329	34,873	1125	32,496	3,850	4,700	10,462	7,646	120,481
	21.0	28.9	0.9	27.0	3.2	3.9	8.7	6.3	100
2018	26,729	34,873	725	33,616	3,795	4,700	13,416	7,684	125,538
	21.3	27.8	0.6	26.8	3.0	3.7	10.7	6.1	100
2019	26,729	35,873	725	34,567	3,795	4,700	15,052	8,199	129,640
	20.6	27.7	0.6	26.7	2.9	3.6	11.6	6.3	100
2020	26,729	36,913	725	35,567	3,795	4,700	17,273	8,479	134,181
	19.9	27.5	0.5	26.5	2.8	3.5	12.9	6.3	100
2021	28,129	42,713	725	35,567	2,595	4,700	18,920	8,969	142,318
	19.8	30.0	0.5	25.0	1.8	3.3	13.3	6.3	100
2022	30,929	43,293	725	35,567	2,595	4,700	20,523	8,969	147,301
	21.0	29.4	0.5	24.1	1.8	3.2	13.9	6.1	100
2023	32,329	43,293	725	33,767	2,595	4,700	22,141	8,969	148,519
	21.8	29.1	0.5	22.7	1.7	3.2	14.9	6.0	100
2024	32,329	43,293	725	33,767	1,195	4,700	23,825	8,969	148,803
	21.7	29.1	0.5	22.7	0.8	3.2	16.0	6.0	100
2025	32,329	43,293	725	33,767	1,195	4,700	26,098	8,969	151,076
	21.4	28.7	0.5	22.4	0.8	3.1	17.3	5.9	100
2026	33,829	43,293	725	33,767	1,195	4,700	27,845	8,969	154,323
	21.9	28.1	0.5	21.9	0.8	3.0	18.0	5.8	100
2027	35,329	43,293	725	33,767	1,195	4,700	29,469	8,969	157,447
	22.4	27.5	0.5	21.4	0.8	3.0	18.7	5.7	100
2028	36,829	43,293	725	33,767	1,195	4,700	31,055	8,969	160,533
	22.9	27.0	0.5	21.0	0.7	2.9	19.3	5.6	100
2029	38,329	43,293	725	33,767	1,195	4,700	32,890	8,969	163,868
	23.4	26.4	0.4	20.6	0.7	2.9	20.1	5.5	100

Japan

In 2002, Japan issued the Basic Act of Energy to ensure steady implementation of energy policy. Since that time, numerous strategic energy plans have been issued. Most recently, in April of 2014, Japan published the Fourth Strategic Energy Plan that outlined the country's long-term comprehensive and systematic energy policy through

[74] *7th BPE (2015-2029) at* p. 81.

2020.[75] This plan was deemed necessary to address current market conditions, including the effects of the Fukushima nuclear accident.[76] Japan, a resource scarce country, is required to import the majority of the fuels it uses to generate power. Therefore, one of Japan's main goals is to assess energy security and stability issues to limit the country's dependence on foreign fuel sources to meet its energy needs.

The Fourth Strategic Energy Plan describes its basic viewpoint on energy policy, which focuses on three principles: [77]

1. Energy Security: ensuring stable supply
2. Economic Efficiency: realizing low-cost energy supply by enhancing its efficiency on the premise of safety; and
3. Environment: initiating maximum efforts to pursue environment suitability.

In setting energy policy goals, Japan's Fourth Strategic Energy Plan identifies the energy sources' characteristic with the goal of achieving energy supply structure with stable supply, low cost, and environmental acceptability. The energy sources' definitions include: [78]

1. Base-load Power Sources: Power output can be operated stably and by low cost, regardless of day or night. Examples include geothermal energy, ordinary hydropower (run-of-river type), nuclear energy, and coal.
2. Intermediate Power Source: Power output can be produced at low cost next to base-load power source, and can respond quickly and flexibly to the situation of electricity demand. Examples include natural gas.
3. Peaking Power Source: Power output can respond quickly and flexibly to the situation of electricity demand in spite of high cost. Examples include oil and pumped-storage hydropower.

The energy policy goal set forth in the Fourth Strategic Energy Plan is focused on reducing carbon emissions, which requires a move away from coal-fired power. However, since coal remains a low-cost option, the Fourth Strategic Energy Plan indicated a need to rely on higher-efficiency technologies.[79] The Fourth Strategic Energy Plan also discussed Japan's plan to privatize the generation facilities and

[75] Fourth Strategic Energy Plan. Government of Japan, Ministry of Economy Trade and Industry. April 2014, p 4.
[76] Japan's Fourth Strategic Energy Plan (2014) at p. 4.
[77] Japan's Fourth Strategic Energy Plan (2014) at p. 17.
[78] Japan's Fourth Strategic Energy Plan (2014) at p. 21.
[79] Japan's Fourth Strategic Energy Plan (2014) at pp. 23-25.

transmission systems in its power system, which would create a more robust and adaptable system to meet energy security and stability goals.[80]

Following the publication of the Fourth Strategic Energy Plan, The Ministry Trade and Industry (METI) established a Long Term Energy Supply and Demand Outlook in July 2015.[81] The Long Term Energy Supply and Demand Committee within METI was created and tasked with developing the Outlook.[82] The committee was held open to the public and included opportunities for public commentary into the process. [83] In June 2015, the cabinet of Japanese Prime Minister Shinzo Abe formally approved the Long Term Energy Supply and Demand Outlook, touting its greenhouse gas emission reduction target of 26% by 2030 (compared to 2013 levels), and articulating the requirements to restart the country's nuclear reactors.[84,85] The Outlook also requires increased efficiency of coal-fired power plants to increase performance consistent with achieving environmental goals.[86] This increased efficiency will likely be met with new higher-efficiency coal-fired power plants.[87]

Through the energy planning process described above, the Japanese government policy determines the types of energy sources that will be used in the future. Public and private energy firms are involved in implementation of the plan with final government approval.[88]

The following Figure 3 sets forth Japan's planned capacity outlook by fuel type presented in the Japanese Long Term Energy Supply and Demand Outlook. This graphic depicts the 2030 path from the current state of the energy sector to the 2030 planned generation mix outlook for Japan.

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[80] Japan's Fourth Strategic Energy Plan (2014) at pp. 40, 73.

[81] Long Term Energy Supply and Demand Outlook. Ministry of Economy Trade and Industry. July 2015, p. 1.

[82] After the Fourth Strategic Energy Plan was completed, the Long-term Energy Supply and Demand Subcommittee was created under the Strategic Policy Committee of the Advisory Committee for Natural Resources and Energy. This subcommittee was tasked to create the Long Term Energy Supply and Demand Outlook.

[83] Japan's Long Term Energy Supply and Demand Outlook (2015) at p. 1.

[84] Japan Adopts Plan to Cut GHG Emissions 26 Percent by 2030, Restart Nuclear Program. *BNA Bloomberg*. June 3, 2015.

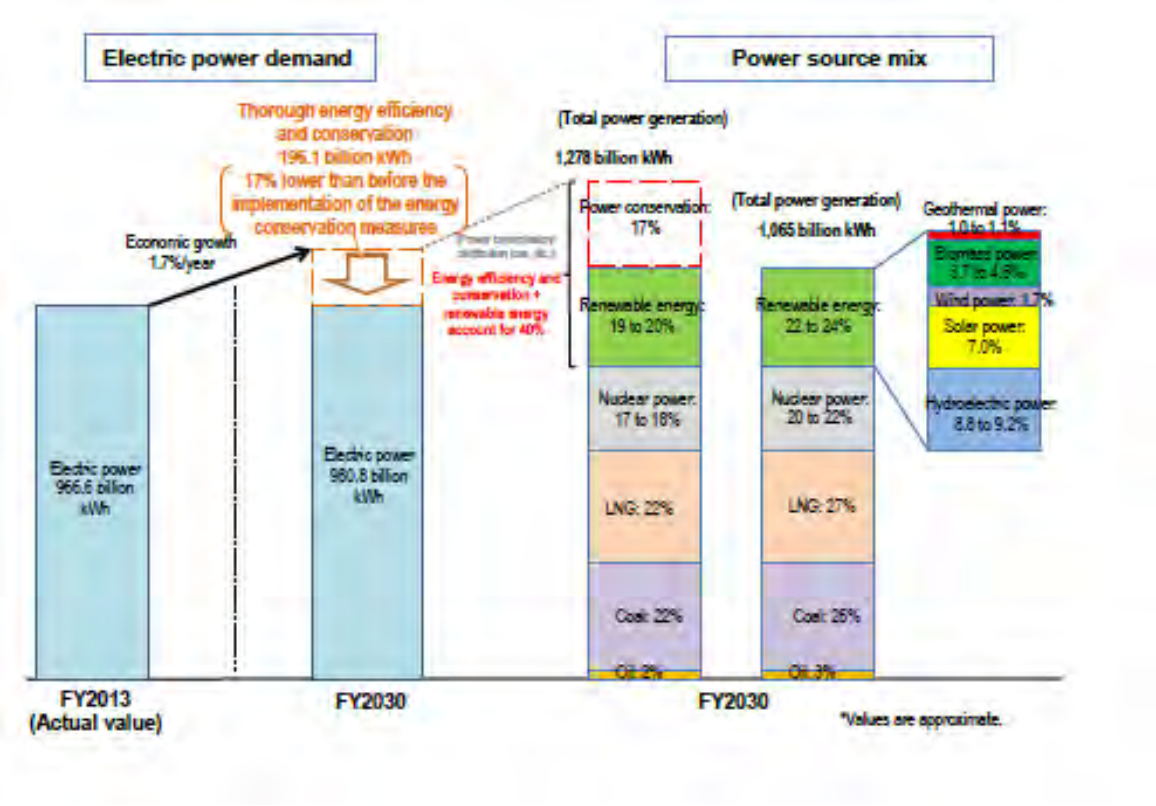
[85] Japan's Long Term Energy Supply and Demand Outlook (2015) at p. 11.

[86] *Id. at* p. 10.

[87] To meet the emissions target, analysts expect new coal-fired power plants to have technology that reduces emissions. Source: Japan's Reliance on Coal Poses Emission Cut Challenges. *BNA Bloomberg*. July 29, 2015.

[88] US EIA Country Overview: Japan. January 2015, p. 3.

Figure 4: Japan's Planning Generation Mix Outlook For 2030[89]



The Japanese power supply system is managed centrally by the General Electricity Utilities on a region-by-region basis.[90] The government has evaluated the structure and determined that it is unable to adequately respond to market demand. As a result, liberalization has been proposed as a means of creating a more robust, market-based system of cross-regional generation and transmission sectors. The liberalized system will be better suited to respond to changes in demand and market forces. The institutional revisions will be made in a three-step implementation process to be completed between 2018 and 2020.[91]

Japan's main electric utility, the Tokyo Electric Power Company (TEPCO), was nationalized in 2012 following the Fukushima accident. The Nuclear Damage

[89] Long Term Energy Supply and Demand Outlook. Ministry of Economy Trade and Industry. July 2015, p. 8.
[90] Fourth Strategic Energy Plan. Government of Japan, Ministry of Economy Trade and Industry. April 2014, p. 60.
[91] *Id. at* p 61.

Compensation Facilitation Corporation became a 50.11% owner of TEPCO.[92] Nationalization can alter the decision-making process of managers as political objectives are introduced into corporate planning.[93]

Taiwan

Taiwan energy markets are largely autonomous from China and the Taiwanese government utilizes its own energy policies. The Taiwan Power Company is the primary utility company in Taiwan and is a state-owned enterprise, administered by the Bureau of Energy within the Ministry of Economic Affairs. Taiwan has a limited domestic supply of energy resources, including all fossil fuels, and therefore imports the majority of its energy fuels. Coal comprises 31% of Taiwan's total primary energy consumption in 2014.[94] Coal is set to remain in Taiwan's energy mix, given current market and political constraints resulting from nuclear energy being politically unpopular.[95]

The Taiwanese government has a long-standing policy of price intervention in its state-owned power companies to maintain stability in the domestic energy market and competitiveness in export industries.[96] For example, the Taiwanese government has consistently subsidized energy costs in an effort to maintain a competitive advantage in the global export and manufacturing markets, spending "NT$20 billion on fossil-fuel subsidies every year."[97] These policies have been somewhat loosened in recent years due to pressure to reduce carbon emissions while maintaining efficiency.

The New Energy Policy currently in effect has stated plans to "reduce nuclear energy dependence" in the wake of nuclear power plan accidents in Japan, while creating a "low-carbon green energy environment" for Taiwan.[98] Taiwan plans to achieve this

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[92] Notice of Change in the Largest Shareholder who is a Major Shareholder, and a Controlling Shareholder other than the Parent Company. Financial Accounting Standards Foundation. May 21, 2012, p. 2.

[93] Acceptance of Preferred Stock by the Nuclear Damage Liability Facilitation Fund. Press release. Tokyo Electric Power Company, July 31, 2012.

[94] Taiwan Profile. US Energy Information Administration. September 2015, p. 1.

[95] Taiwan's Energy Problem. *Asia Program Special Report*. Woodrow Wilson Center for Scholars, pp 1, 10.

[96] *Id.* at p. 11.

[97] Wei-han C. Nobel laureate criticizes energy policy, subsidies. *Taipei Times*. April 18, 2016. Accessed May 25, 2016. http://www.taipeitimes.com/News/taiwan/archives/2016/04/18/2003644231

[98] New Energy Policy of Taiwan. Bureau of Energy, Ministry of Economic Affairs. February 24, 2016. Accessed May 25, 2016. http://web3.moeaboe.gov.tw/ECW/english/content/Content.aspx?menu_id=969

policy through efficient use of energy and full exploration of renewable energy, thus stabilizing their power supply and reducing carbon emissions.[99]

Taiwan's Guideline on Energy Development identifies the country's priorities, including:

> "To ensure energy security and to satisfy people's basic needs, while taking into consideration of environmental protection and economic development, and promoting sustainable energy development under the principles of social justice and cross-generation fairness."[100]
>
> and
>
> "To ensure the balanced and stable energy supply and demand in the short, medium and long terms and to achieve the above-mentioned energy development goals, the Guideline has regulated the energy policies principles and strategies, which serve as the basis for general energy development planning. This Guideline serves as the guidance for national energy development, related energy policy, standards and action plans. "[101]

Moreover, on the basis of this guideline, "Assessment Standards for Energy Development and Use" and "Energy Development Policy" will be concluded to implement the preliminary management of energy and to plan the quantity of future energy supply, as well as to regulate the location and proportion of various energies.[102]

Taiwan's specific development prospects identified in the Guideline on Energy Development require the government to construct an energy supply and demand system that is safe, stable, efficient, and clean. It further requires the government to build an environment that helps energy-saving and carbon reduction. These requirements are intended to facilitate achievement of targets of energy saving and carbon reduction, and realization of sustainable development of energy in Taiwan.[103]

Taiwan's Guideline on Energy Development sets forth the requirement regarding supply side power generation resource development. Taiwan identified an energy

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[99] *Id.* at p. 2
[100] *Id.* at p. 1
[101] *Id.* at p. 1
[102] *Id.* at p. 1
[103] *Id.* at p.1

structure goal to use coal-fired power plants, with flexible adjustments, and to promote techniques to introduce clean coal and carbon reduction techniques, which will diminish carbon emission due to a reduction in coal use.[104]

China

The Chinese government is heavily involved in the energy industry planning process, including the decision-making regarding the types of power plants that will be built.

China's energy market is highly regulated and largely directed through government policy. The Chinese power market is heavily reliant on coal-fired power plants to generate electricity. For example, coal power generation comprised 69% of consumed energy in 2011.[105] While China's 2015 5-Year Plan laid out plans to address carbon emissions issues, coal is still likely to remain the primary source of generation for the near and middle term.[106]

The Chinese government's most recent Five-Year Plan included 58 gigawatts of nuclear generating capacity in operation by 2020. China will start building more nuclear power plants by 2020, with the goal of 150 gigawatts of nuclear power by 2030.[107] In addition, the Chinese government has prioritized the expansion of LNG and alternative energy sources to address carbon emissions issues. However, given China's rapid and continued growth, demand for energy will likely outpace current technological advancements.[108]

Evidence of controls inherent in the Chinese energy market is discussed by the U.S. Energy Information Administration:

> "On-grid (electricity sold by generators to the grid) and retail electricity prices are determined and capped by the NDRC [National Development and Reform Commission]. The NDRC also determines the price that coal companies should receive from power producers for a certain level of supplies."[109]

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[104] *Id.* at p. 4

[105] China Profile. U.S. Energy Information Administration, February 4, 2014, p. 3.

[106] *Id.*

[107] Follett A. China Will Literally Double the Amount of Nuclear Power. The Daily Caller. March 24, 2016. Accessed May 25, 2016. http://dailycaller.com/2016/03/24/china-literally-doubles-down-on-nuclear-power/#ixzz49fLxESGF

[108] US Energy Information Administration, China Profile, February 4, 2014, p. 33.

[109] China Profile. U.S. Energy Information Administration, February 4, 2014, p. 32.

The Chinese central government is integral to the decision-making process regarding opening new facilities. While private investors apply to build new facilities, the final approval is given by the central planners.[110]

China's central government in Beijing sets broad economic development goals, which are implemented by government officials in local governments (e.g., provincial, municipal, county, and township governments). Central government strategies are issued in the form of five-year plans, which outline economic development priorities for the next five years. The 13th Five-Year Plan was announced in 2015 and outlines policy for the period from 2016 to 2020.[111] The term "plan" suggests the use of detailed directives. However, in practice, five-year plans lack detailed implementation guidelines and instead set broad goals for the national economy. In the last two five-year plans, innovation was prioritized as a central element of China's development goals. Local governments account for 70% of government spending,[112] and face considerable fiscal responsibilities in financing a wide range of government programs, including infrastructure, healthcare, and education.

Chapter 2: Evaluation of Economic Decision Making for Building Coal-fired Power Plants for South Korea, Taiwan and Japan

Chapter 2 will analyze whether the impact of the Project is likely to cause a change in the decision-making to build a new coal-fired power plant in South Korea, Japan, Taiwan, and China, with respect to the economic decision-making in selecting what types of power plants to build when additional sources of power supply are needed.

Details of the Economic Analysis of Building Coal Power Plants

We conducted research and an economic analysis of the decision-making for building coal plants in South Korea, Taiwan, and Japan. The purpose of the research was to gather data to analyze and evaluate the capital costs and operational cash flows of coal-fired power plants compared to other types of similarly-capable power plants, and to determine the potential impact on the economics of coal-fired power plants if a small price decline in the coal commodity purchases occurs as a result. The analysis evaluates

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[110] China's Energy Markets: Anhui, Chongqing, Henan, Inner Mongolia, and Guizhou Provinces. US EPA Coalbed Methane Outreach Program, p. 68.

[111] China's 13th Five-Year Plan (2016-2020). *China's Policy Think Piece Series Issue No. 3*. Fung Business Intelligence Centre. November 2015.

[112] Landry. *Decentralized Authoritarianism in China: The Communist Party's Control of Local Elites in the Post-Mao Era.* Cambridge: Cambridge University Press, 2008. p. 3.

whether a relatively small decline in coal prices (e.g., 5%)[113] that could result when the Project is operating would change the economic business decision-making, such that a coal-fired power plant would be more likely to be built instead of a power plant relying on another fuel type (such as natural gas or nuclear power plants).

This analysis focuses on coal-fired, nuclear, and natural gas-fired power plants because these types of power plants have the substantial economic scale necessary to generate larger quantities of electricity. They also have the ability to provide operational services around the clock. Because of these factors, these types of power plants are likely to be considered as relevant options if traditional baseload generating capacity is needed.

For this research, we investigated government sector resources, electricity industry organizations, and other publicly available sources to identify available data.

The following discussion provides background on the capital expenditures required to build coal-fired power plants. It also summarizes the economic analysis of total capital and operational costs from building a new coal-fired power plant, nuclear power plant, and natural gas-fired power plant in South Korea, Taiwan, and Japan. Further, it evaluates of the impact on the economic decision-making, if any, as a result of a small change in coal prices that may result from the operation of the Project.

Capital Expenditures from New Coal-Fired Power Plants

Baseload power plants, such as coal-fired power plants, are very large, complicated energy infrastructure projects with substantial capital costs required to build the facility. The total capital cost of the power plant is a consideration in making a decision regarding the type of power plant to build.

As Table 1 (below) illustrates, capital expenditures needed to build new supercritical coal power plants in various countries are reported to range from approximately $600/kw to over $2,500/kw (in U.S. dollars). These estimated capital costs per unit of capacity translate to $1.2B to $5.0B for a 2,000mw supercritical coal plant.[114]

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[113] An illustrative 5% coal price decrease is used in this analysis because the Draft EIS did not provide information on the coal price impact resulting from the Project. A smaller coal price decline will have even less impact than discussed in this memo. Draft EIS. *The SEPA Coal Market Assessment Technical Report*, p. 4-11.

[114] Different types of coal plants will have different levels of costs, with higher capital costs for more complicated power plants that utilize additional technologies and capabilities.

Table 1: Capital Costs Estimates for New Power Plants[115]

	Low	Medium	High
$2010/KW	$600	$1,000	$2,500
MW	2,000	2,000	2,000
Total Cost ($1,000)	$1,200,000	$2,000,000	$5,000,000

A change in the price of coal fuel that may result from the operation of the Project has no impact on the total capital cost of a large coal-fired power plant in South Korea, Taiwan, and Japan.

Economic Analysis of Total Operational and Capital Costs of New Power Plants

This economic analysis evaluates the total economic cost of the baseload power plants (coal, nuclear, and natural gas) in South Korea, Taiwan, and Japan. The economic cost items include all of the costs required to build and operate the power plant over a reasonable economic life of the asset. The power plant asset assumed typical size and efficiency levels of new power plants. The cost to build the plant includes the equipment costs associated with the power plant and the construction-related costs to build the facility. The operational costs of the power plant include fuel commodity and delivery costs, fixed and variable operations and maintenance costs, financing-related costs associated with debt and equity financing, and taxes and other related fees.

The total economic cost over the asset life is evaluated on an average annual basis for each type of baseload power plant (coal, nuclear, and natural gas). An additional total economic cost is calculated for the coal-fired power plant, with a revised coal fuel price reflective of a 5% lower coal commodity cost. The purpose is to evaluate if the relative economic costs of coal-fired power plants compared to natural gas-fired and nuclear power plants has materially changed as a result of a 5% reduction in the coal commodity cost.

The following discussion provides the results and conclusions of the economic analyses conducted for South Korea, Taiwan, and Japan.

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[115] *High-Efficiency, Low-Emissions (HELE) Perspectives for Selected Countries*. International Energy Agency, Clean Coal Centre. September 2015.
http://www.minerals.org.au/file_upload/.../HELE_perspectives_for_selected_countries.pdf

South Korea

For South Korea, the economic analysis evaluating the total economic cost of the baseload power plants (coal, nuclear, and natural gas) relied on information on the capital and operating costs of baseload power plants from South Korea's most recent long-term electricity supply and demand plan.[116] Delivered fuel costs data was derived from government agencies such as the IEA, as well as coal price data supplied by Energy Venture Analysis. Non-fuel operations and maintenance costs and other power plant performance assumptions were based on technology-specific inputs reported by the EIA or other relevant industry sources.

Table 2 (below) shows that a 5% reduction in the coal fuel costs has an approximate 3% reduction in the total annual operational and capital costs for a coal plant in South Korea. This result reflects a de minimis impact on the total economic cost of the coal-fired power plant, which does not materially change the relative total economic cost of coal-fired power plants compared to other fuel types. Therefore, the overall economic decision to build a coal-fired power plant as compared to other fuel types has not changed.

Table 2: Annual Capital and Operations Costs for Baseload Power Plants for South Korea, With and Without a 5% Decrease in Coal Fuel Cost

Plant Type	Coal-fired power plant	Natural Gas Combined Cycle power plant	Nuclear power plant
Capital Cost ($/KW)	**$837**	$912	$1,641
Capital Costs & 5% lower coal price ($/KW)	**$837**	$912	$1,641
Total Operations Costs w/capital repayment ($/KW)	**$393**	$640	$384
Total Operations Costs w/capital repayment & 5% lower coal price ($/KW)	**$381**		
Percent Change	**-3.0%**		

[116] *7th BPE (2015-2029)* at pp. 39, 81.

Taiwan

For Taiwan, the economic analysis evaluating the total economic cost of the baseload power plants (coal, nuclear, natural gas) relied on information on the capital costs of baseload power plants based on estimated capital costs for a supercritical coal-fired power plant, and a nuclear power plant in China and South Korea and estimates of capital costs for natural gas-fired power plants as a proxy due to data limitations.[117,118,119] Delivered fuel costs data was derived from government agencies such as the IEA, as well as coal price data supplied by Energy Venture Analysis. Non-fuel operations and maintenance costs and other power plant performance assumptions were based on technology-specific inputs reported by the EIA or other relevant industry sources.

Table 3 (below) shows that a 5% reduction in the coal fuel costs has an approximate 3.3% reduction on the total annual operational and capital costs for a coal-fired power plant in Taiwan. This result reflects a de minimis impact on the total economic cost of the coal-fired power plant, which does not materially change the relative total economic cost of coal-fired power plants compared to other fuel types. Therefore, the overall economic decision to build a coal-fired power plant as compared to other fuel types has not changed.

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[117] *High-Efficiency, Low-Emissions (HELE) perspectives for Selected Countries*. International Energy Agency, Clean Coal Centre. September 2015.
http://www.minerals.org.au/file_upload/.../HELE_perspectives_for_selected_countries.pdf

[118] *7th Basic Plan for Long Term Electricity Supply and Demand (2015-2029).* South Korean Ministry of Trade, Industry and Energy. July 2015, pp 39, 81.

[119] What Does it Cost to Build a Power Plant? - ILAR - University, p. 12.
http://ilar.ucsd.edu/assets/001/503883.pdf

Table 3: Annual Capital and Operations Costs for Baseload Power Plants for Taiwan, With and Without a 5% Decrease in Coal Fuel Cost

Plant Type	Coal-fired power plant	Natural Gas Combined Cycle power plant	Nuclear power Plant
Capital Cost ($/KW)	**$679**	$912	$2,037
Capital Costs & 5% lower coal price ($/KW)	**$679**	$912	$2,037
Total Operations Costs w/capital repayment ($/KW)	**$346**	$616	$390
Total Operations Costs w/capital repayment & 5% lower coal price ($/KW)	**$335**		
Percent Change	**-3.3%**		

Japan

For Japan, the economic analysis evaluating the total economic cost of the baseload power plants (coal, nuclear, and natural gas) relied on information on the capital and operating costs of baseload power plants from Japan's long-term planning documents. These documents conducted an analysis that could be used to compare the total economic cost of different types of baseload power plants considered on an annual basis for the year 2030.

Table 4 (below) shows that a 5% reduction in the coal fuel costs has an approximate 2% reduction on the total annual operational and capital costs for a coal plant in Japan. This result reflects a de minimis impact on the total economic cost of the coal-fired power plant, which does not materially change the relative total economic cost of coal-fired power plants compared to other fuel types. Therefore, the overall economic decision to build a coal-fired power plant as compared to other fuel types has not changed.

Table 4: Annual Capital and Operations Costs* for Baseload Power Plants for Japan, With and Without a 5% Decrease in Coal Fuel Cost[120]

	Coal Plant	Coal Plant (with 5% coal fuel price decline)	Natural Gas Combined Cycle	Nuclear Power	Gas Cogeneration
Fuel Cost	5.10	4.85	10	1.5	
Capital Costs	2.10	2.10	1	3.1	1.1
Other Costs	5.70	5.70	2.4	5.7	12.7
Total Cost	*12.90*	*12.65*	*13.4*	*10.3*	*13.8*
Percent Diff from Coal			3.9%	-20.2%	7.0%
Percent Diff from Coal (less 5%)		-2.0%	6.0%	-18.5%	9.1%

**Expressed in yen/kwh*

Conclusion:

The evaluation of government planning roles in the decision-making of building new coal-fired power plants in South Korea, Japan, Taiwan, and China provides evidence of the substantial role of government planning in the selection of new power plants. The selection of the type of power plants is generally predetermined by government entities and implemented by the energy sector. For this reason, a small change in the price of coal will not likely have an impact on government planning decisions to build new coal-fired power plants.

The evaluation of the economic decision-making involved in selecting the specific type of power plant to build in South Korea, Taiwan, and Japan shows that a modest 5% fuel coal price reduction that could result from the project has a de minimis impact on the total annual capital and operations costs (less than or equal to 3%), and no impact on the total substantial capital expenditures associated with building a new coal-fired power plant. Consequently, the economics of business decision-making of the selection of the type of power plant to be built is not likely to change as a result of the Project.

[120] Report on Analysis of Generation Costs, Etc. for Subcommittee on Long-term Energy Supply-demand Outlook. May 2015, p. 13.

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COALCAST

FUELCAST

June 13, 2016

TO: Millennium Bulk Terminal - Longview

FROM: Seth Schwartz

RE: Heat Content of Indonesia Coals

Summary and Conclusions

EVA was retained by Millennium Bulk Terminal ("MBT-Longview") to review the assumptions made by ICF regarding the relative heat content of the coal which would be exported through MBT-Longview compared to the heat content of the coal which would be displaced from other countries. Our review was based upon ICF's summary of modeling assumptions for the MBT-Longview Coal Market Analysis and supplemented with a review of ICF's draft SEPA EIS reports (Coal Market Assessment and Greenhouse Gas Emissions Technical Reports). Based upon this review, we have reached the following conclusions:

1. ICF erroneously assumes (without any supporting documentation) that the heat content of subbituminous coal exported from Indonesia (which is the only source of subbituminous coal in ICF's model other than the PRB coal exported through MBT-Longview) has a much higher heat content than PRB coal. As a result of this erroneous assumption, ICF projects that it will require greater quantities of coal shipped through MBT-Longview to replace the same heat content of Indonesian coal. This assumption results in higher GHG emissions for the same amount of electricity generated from coal, from both coal combustion and transportation via rail, truck, and ocean vessels.
2. ICF's coal market model projected that coal exports through MBT-Longview would shift from 100% PRB subbituminous coal in the early years (through 2030) to both PRB and bituminous coal from the Uinta Basin (in the 2040 model year), with no explanation of why this change would happen.
3. ICF's coal market model assumed that subbituminous coal exports from MBT-Longview would displace both subbituminous and bituminous coal consumption in Asian markets, with no analysis supporting this assumption. ICF did not address the ability or inability of Asian customers to switch from bituminous to subbituminous coal.

This memorandum is intended to address conclusion #1 above, and to provide accurate information on the heat content of Indonesian subbituminous coal.

Heat Content of Coal Assumed by ICF

Although ICF was not explicit about all of the coal sources that it considered in its model, it appears ICF only considered coals for the Asian market from the United States (PRB subbituminous and Uinta bituminous), Indonesia (bituminous and subbituminous), Australia (bituminous) and China (bituminous and lignite). The heat contents of these coals are listed in ICF's Modeling Assumptions document, and the same list is in the GHG Technical Report. It is reproduced below, but EVA has added the columns with Btu per pound and kcal/kg, calculated from the heat content in MMBtu per ton.[1]

Source	Coal Type	Heat Content (MMBtu/ton)	CO_2 (lb/MMBtu)	Heat Content (Btu/pound)	Heat Content (kcal/kg)
PRB – WY	Sub	17.6	214.3	8,800	4,889
PRB – MT	Sub	18.6	215.5	9,300	5,167
Uinta – CO	Bit	21.5	209.6	10,750	5,972
Uinta – UT	Bit	23.4	209.6	11,700	6,500
Australia	Bit	24.1	205.3	12,050	6,694
Indonesia	Bit	23.7	205.3	11,850	6,583
Indonesia	Sub	19.44	212.7	9,720	5,400
China	Bit	20.88	205.3	10,440	5,800
China	Lig	9.79	215.4	4,895	2,719

ICF did not provide an accurate citation for the assumed heat content and emission factors for international coals. In the SEPA GHG Technical Report, there is no source provided at all for Table 31, where the heat contents are listed. The Modeling Assumptions document provides the following citation for this table: "Source: EPA Base Case IPM v5.13 for domestic coals and EIA CO_2 Emission Factors for Coal study for international coals (1994, B.D. Hong and E. R. Slatick)." Virtually the same reference is listed in the SEPA Coal Market Assessment Technical Report: "Hong, B.D. and E.R. Slatick. 1994. EPA Base Case IPM® v5.13 for Domestic Coals and EIA CO_2 Emissions Factors for Coal Study for International Coals. Energy Information Administration, *Quarterly Coal Report*: 1–8." However, the link to the referenced article shows that the 1994 article, which is still available on the EIA website, shows no information at all about the heat content of any coal (domestic or international).[2] The only information in the article relevant to the table is the carbon dioxide emission factors for U.S. coals. The emission factors relied upon by ICF do not match the factors provided in the referenced article and all of the emission factors used by ICF overstate (are greater than) the emission factors for U.S. coals from Wyoming, Montana, Colorado and Utah, as reported by EIA.

Further, the heat contents for U.S. coals that the Draft EIS references in the SEPA Coal Market Assessment Technical Report have different values that do not match the heat contents listed in the table above. ICF provided the coal supply curves and the price forecasts for U.S. coals in its IPM model on Table 12, with Utah Uinta coal at 11,500 Btu per pound (not 11,700), Colorado Uinta coal

[1] ICF Modeling Assumptions, coal characteristics, and ICF SEPA GHG Technical Report, Table 31.
[2] http://www.eia.gov/coal/production/quarterly/co2_article/co2.html

at 11,780 Btu (not 10,750), Montana PRB coal at 9,100 Btu (not 9,300 Btu), and Wyoming coal at 8,800 Btu.[3]

Thus, it is impossible to state what heat contents the Draft EIS used in its analysis and the source of the heat contents. The assumption that low heat content U.S. PRB coal would displace coals with higher heat content (subbituminous and bituminous) from other countries (Indonesia and Australia) is the key factor in ICF's conclusion that "coal consumption in the Pacific Basin would increase in all scenarios. The exported coal has a lower heat content than the coal that it displaces, and thus, more coal must be consumed to achieve the same electric power output."[4] Because of the higher GHG emission rate assumed by ICF for U.S. coals (which is a function of the lower heat content), the increase in CO_2 emissions is largely due to the assumption that U.S. coals exported through MBT-Longview would have lower heat content than the coals produced in Indonesia and Australia which it would displace. This assumption is simply not supported by the materials cited in the Draft EIS itself or supporting technical reports.

Heat Content of Indonesian Coals

Indonesia has rapidly become the world's largest exporter of thermal (also called "steam") coal (coal burned for its heat content, rather than coal used in steel-making), which is the type of coal that will be exported through MBT-Longview (U.S. metallurgical coals are produced only in Appalachia). ICF understates the importance of Indonesia in its Coal Market Assessment, ranking countries by their total coal exports in 2012, not just their thermal coal.[5] Because Australia exports large amounts of metallurgical coal, it is not nearly as important as ICF represents in the analysis of MBT-Longview's coal exports. A more accurate ranking of thermal coal exporters is shown below.

Major Steam Coal Exporters – 2012-2014 (million metric tons)[6]

Country	2012	2013	2014
Indonesia	384.3	424.3	408.2
Australia	159.2	182.1	194.6
Russia	112.5	117.5	132.0
Colombia	81.7	79.0	78.8
South Africa	75.3	74.0	76.0

The coals produced and exported from Indonesia cover a wide range of heat content, ranging from high-rank bituminous coals (with high heat content), to very low-rank lignite (with low heat content). The range of quality can be seen from the "marker" price published monthly by the Indonesian Ministry of Energy and Mineral Resources. The government publishes marker prices for every major Indonesian grade of coal exported in order to establish the price on which the payment of government royalties is calculated.[7] The marker price for each coal is known as the HPB ("Harga Patokan Batubara") and is published for 82 separate coal brands marketed by

[3] ICF SEPA Coal Market Assessment Technical Report, page 4-5.
[4] ICF SEPA Coal Market Assessment Technical Report, page 7-2.
[5] ICF SEPA Coal Market Assessment Technical Report, Table 10, page 3-2.
[6] International Energy Agency, "Coal Information 2015", Table II.10.
[7] See https://www.minerba.esdm.go.id/.

Indonesian coal exporters. The coal quality ranges from a high of 7,000 kcal/kg (12,600 Btu per pound) to a low of 2,995 kcal/kg (5,391 Btu).[8] The government lists nine coals classified as lignite (2,995–4,200 kcal/kg), 17 coals classified as subbituminous (4,400–5,400 kcal/kg), 16 coals classified as lower-rank bituminous (5,500–5,765 kcal/kg), and 41 coals classified as higher-rank bituminous (5,900–7,000 kcal/kg).

Given this range of Indonesian coal quality, it is difficult to select a single specification as the "typical" heat content for the exports of Indonesian subbituminous and bituminous coals as the reference coal for calculating changes in coal burn and GHG emissions. However, it is clear that the quality selected by ICF is at the very top of the range for subbituminous coal (5,400 kcal/kg, or 9,720 Btu/pound) and near the top of the range for bituminous coal (6,583 kcal/kg, or 11,850 Btu/pound). The effect of this assumption is to overstate the size of any GHG impact in the Pacific basin, from both coal combustion and coal transportation.

In order to determine a reasonable estimate of the heat content of Indonesian coal exports, EVA has performed a study of the largest Indonesian coal mines and exporting coal companies to calculate the average heat content of Indonesian coal. EVA identified the nine largest Indonesian coal producers, including all companies that produced or sold at least 10 million metric tons in any year from 2013 to 2015. All of these producers operate on the island of Kalimantan, the major source of Indonesian coal.[9] The data sources included company financial and marketing reports available on their websites, with data on sales by brand or production by mine, where applicable (some companies blend coal from different mines to meet the quality specification for a brand that is sold in the export market). At this time, not all companies have reported their sales and production for the full year of 2015. The data was supplemented by information from the Indonesian Coal Book, published by Petromindo.com, where necessary.

The largest Indonesian coal producers covered by this analysis sold and produced a total of 261 million tonnes in 2013, compared to total Indonesian coal production of 421.5 million tonnes.[10]

Largest Indonesian Coal Producers

	Sales/Production (mm tonnes)		
	2013	**2014**	**2015**
Adaro Energy	52.2	55.7	50.8
Kaltim Prima Coal	53.4	52.3	
Kideco	37.3	40.4	39.0
Arutmin	28.9	32.3	
ITM	29.4	29.1	28.5
Berau Coal	23.5	24.2	
Sakari Resources	11.2	9.8	
Bayan Resources	13.7	9.6	
Harum Energy	11.6	7.0	3.6
	261.2	**260.4**	**121.9**

[8] The conversion factor is kcal/kg times 1.8 = Btu/pound.
[9] This analysis excluded the state-owned company PT Bukit Asam (PTBA), which operates in Sumatra and principally supplies domestic customers.
[10] Pertromindo.Com, "Indonesian Coal Book 2014/2015," page 6.

The list of coal sales and production for each company by mine and brand is shown below. The heat content is stated in kcal/kg on a gross, as-received ("GAR") basis, which is the standard used for U.S. coals as well.[11]

Heat Content and Sales of Indonesian Coal by Mine and Brand

			Heat	Sales/Production (mm tonnes)		
Company	**Mine/Brand**	**Coal Type**	**kcal/kg**	**2013**	**2014**	**2015**
Adaro Energy	E4000	Subbituminous	4,000	9.6	6.6	2.5
Adaro Energy	E4900	Subbituminous	4,900	8.4	30.8	34.1
Adaro Energy	E5000	Subbituminous	5,000	34.1	18.3	14.3
Arutmin	Asam Asam	Subbituminous	4,750	8.4	7.6	
Arutmin	Batulicin	Bituminous	6,200	5.9	7.3	
Arutmin	Kintap	Subbituminous	4,750	7.8	8.6	
Arutmin	Mulia	Subbituminous	4,750	3.7	8.1	
Arutmin	Satui	Bituminous	6,400	2.0	0.2	
Arutmin	Senakin	Bituminous	6,300	1.1	0.5	
Bayan Resources	GBP	Bituminous	7,000	3.5	2.6	
Bayan Resources	PIK	Subbituminous	4,650	2.1	0.8	
Bayan Resources	Tabang	Subbituminous	4,100	2.2	1.9	
Bayan Resources	TSA/FKP	Bituminous	5,950	2.7	2.2	
Bayan Resources	WBM	Bituminous	6,400	3.2	2.1	
Berau Coal	Binungan	Subbituminous	4,740	8.0	9.3	
Berau Coal	Lati	Subbituminous	4,960	10.4	9.9	
Berau Coal	Sambarata	Bituminous	5,780	5.1	5.0	
Harum Energy	Mahakam Sumber Jaya	Bituminous	5,750	9.9	6.6	3.6
Harum Energy	Santan Batubara	Bituminous	5,377	1.7	0.4	-
Indo Tambangraya Megah	Bharinto	Bituminous	6,600	1.6	2.5	2.8
Indo Tambangraya Megah	Indominco	Bituminous	6,150	15.1	15.0	13.3
Indo Tambangraya Megah	Jorong	Subbituminous	5,300	1.3	1.3	1.3
Indo Tambangraya Megah	Kitadin-Embalut	Bituminous	5,800	1.0	1.3	1.2
Indo Tambangraya Megah	Kitadin-Tandung-Mayang	Bituminous	6,700	2.4	1.8	2.5
Indo Tambangraya Megah	Trubaindo	Bituminous	6,900	7.8	7.2	7.3
Kaltim Prima Coal	Bengalon	Bituminous	5,700	7.9	8.4	
Kaltim Prima Coal	Sangatta	Bituminous	6,700	45.5	43.9	
Kideco	Roto Middle	Subbituminous	4,730	3.8	4.3	3.0
Kideco	Roto North	Subbituminous	5,470	3.4	3.0	3.4
Kideco	Roto South	Subbituminous	4,870	15.8	15.9	13.6
Kideco	Samarangau	Subbituminous	4,430	13.8	16.7	18.5
Kideco	Susubang	Subbituminous	5,120	0.5	0.5	0.5
Sakari Resources	Jembayan	Subbituminous	5,500	8.2	6.8	
Sakari Resources	Sebuku	Bituminous	6,000	3.0	3.1	
				261.0	**260.4**	**121.8**

[11] Gross heat content is the higher heating value ("HHV") and as-received means the coal quality for the coal quantity delivered. Sometimes, coal heat content is also specified on a "net" basis ("NAR"), which is the lower heating value (this excludes the heat lost through vaporization of water), or on an air-dried basis ("GAR"), which excludes surface moisture.

The average heat content of Indonesian subbituminous and bituminous coal mines listed above is shown below. The average heat content for subbituminous coal is about 4,820 kcal/kg, equal to 8,676 Btu/pound. This heat content is lower than the heat contents for U.S. PRB coals that are likely to be exported through MBT-Longview (Montana – 9,300 Btu; Wyoming – 8,800 Btu). It is much lower than the heat content for Indonesian subbituminous coal assumed by ICF (5,400 kcal/kg, equal to 9,720 Btu/pound). The average heat content for Indonesian bituminous coal is about 6,365 kcal/kg (11,457 Btu/pound), which is similarly much lower than ICF's assumption of 6,583 kcal/kg (11,850 Btu/pound).

Average Heat Content for Indonesian Coal

	2013	2014	2015
MM Tonnes			
Bituminous	119.4	110.1	30.7
Subbituminous	141.6	150.4	91.1
Average kcal/kg			
Bituminous	6,364	6,377	6,354
Subbituminous	4,820	4,813	4,813

Other Sources for Typical Indonesian Coal Heat Content

There are coal industry trade publications that produce price indexes for coals traded in the world market. Each price index is for a country of origin and a coal quality typical of coal exported from that country. While these price indexes do not cover every coal exported from each country, they are intended to be benchmark prices that producers and consumers can use for transactions.

Two of the sources of Pacific Basin coal prices cited by ICF in its analysis are IHS McCloskey and Platts.[12] These companies publish regular assessments of coal prices for a variety of coals sold in the international market. Both companies publish marker prices for Indonesian coal exported to the world market. The heat contents for the Indonesian coals published by McCloskey and Platts are shown below:

Indonesian Coal Market Price Specifications[13]

	IHS McCloskey			Platts		
Coal Type	**kcal/kg**	**Basis**	**GAR**	**kcal/kg**	**Basis**	**GAR**
Bituminous	6,000	NAR	6,300	5,900	GAR	5,900
Bituminous	5,500	NAR	5,775			
Subbit.	4,700	NAR	4,935	5,000	GAR	5,000
Subbit.	4,200	GAR	4,200	4,200	GAR	4,200
Subbit.	3,800	GAR	3,800	3,800	GAR	3,800

[12] ICF SEPA Coal Market Assessment Technical Report, Figure 14, page 3-8.

[13] The kcal/kg specification is published by IHS McCloskey and Platts on either a gross or net basis as shown. The NAR specification is converted to a GAR equivalent using a factor of 1.05. Sources: IHS Energy Thermal Coal and Petcoke Marker Price Methodology and Specifications, May 2016, and Platts Coal Methodology and Specifications Guide, May 2016.

As shown, the heat content specifications used by both publications for Indonesian subbituminous coal range from 3,800 to 5,000 kcal/kg on a GAR basis (6,840–9,000 Btu/pound). These specifications are much lower than the 5,400 kcal/kg (9,720 Btu/pound) assumed for Indonesian subbituminous coal in the ICF analysis. Similarly, the marker price heat content for Indonesian bituminous coals range from 5,775 to 6,300 kcal/kg, much lower than the 6,583 kcal/kg assumed by ICF.

Other market experts recognize that the recent large growth in coal supply from Indonesia is from low-rank subbituminous coals with heat contents much lower than assumed by ICF. The presentation by Dr. Bart Lucarelli of Stanford University's Institute for International Studies referenced the development of major Indonesian low-rank coal deposits (Adaro – Wara, Kideco – SM, and Arutmin – Ecocoal) with heat contents ranging from 4,000 to 4,221 kcal/kg GAR.[14] The U.S. Department of Energy, National Energy Technology Laboratory ("NETL") also considers the heat content of Indonesian subbituminous coal to be comparable or less than the heat content of U.S. PRB coals which it would compete with in the Asian market.

Conclusions

ICF erroneously assumed that the coals exported through MBT-Longview would have lower heat content than the coals they would displace in the Pacific Basin, because ICF assumed both that Indonesian subbituminous coal would have heat content at the top of the range for subbituminous coal (thus higher than U.S. PRB coal) and that U.S. PRB coal would displace bituminous coal in the Pacific Basin. Neither of these assumptions was supported by any documentation. These false assumptions are the primary driver of ICF's conclusion that GHG emissions from coal combustion in the Pacific Basin would increase under all scenarios[15] because the assumed lower heat content of coal exported through MBT-Longview requires more coal to be consumed at higher GHG emission rates to generate the same amount of electricity. Further, the mistaken assumption that MBT-Longview coals would have lower heat content also has the effect of overstating ICF's calculation of GHG emissions from coal transportation.

[14] Lucarelli. 2011, p. 37.
[15] ICF SEPA Greenhouse Gas Emissions Technical Report, page 3-9.

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COALCAST
FUELCAST

June 12, 2016

TO: Millennium Bulk Terminal - Longview

FROM: Seth Schwartz

RE: Carbon Coefficients of U.S. and Indonesian Coals

Summary and Conclusions

EVA was retained by Millennium Bulk Terminal ("MBT-Longview") to review the assumptions made by ICF regarding the relative carbon coefficients[1] of the U.S. coal which would be exported through MBT-Longview compared to the carbon coefficients of the coal which would be displaced from other countries. Our review was based upon ICF's summary of modeling assumptions for the MBT-Longview Coal Market Analysis and supplemented with a review of ICF's draft SEPA EIS reports (Coal Market Assessment and Greenhouse Gas Emissions Technical Reports). Based upon this review, we have reached the following conclusions:

1. ICF assumed that the carbon coefficients of the U.S. subbituminous and bituminous coals which would be exported through MBT-Longview were significantly greater than the coals which it would displace in the Asian market. This assumption results in an increase in GHG emissions due to the proposed action even if there were no induced demand for coal, simply by substituting higher-emitting U.S. coal for lower-emitting Asian coal.
2. ICF did not provide accurate sources for its assumed carbon coefficients. ICF provided only one referenced source for its assumption of the carbon dioxide emission factors for coal, yet this source had lower carbon coefficients for U.S. coals than assumed by ICF and had no carbon coefficients for international coals at all.[2] ICF also referenced itself in its model assumptions used for the EPA Base Case IPM v5.13, yet this also references the same source. There is no documentation of the carbon coefficients for international coals at all.
3. ICF asserts that "[t]he carbon content varies by rank (i.e., bituminous, subbituminous, and lignite) and by the source region of the coal; however, the data by region is incomplete."[3] While it is logical that the carbon coefficient varies by rank, because of the ratio of carbon to

[1] Measured as the carbon dioxide emission factor in pounds of CO_2 per million Btu of coal heat content.
[2] Hong, B.D. and E.R. Slatick. 1994.
[3] ICF SEPA Coal Market Assessment Technical Report, page 4-12.

hydrogen in the coal, there is no reason to believe that it varies by "source region" of the coal. ICF makes no attempt to explain why this would be true and it is counter to the assumptions that the Energy Information Agency ("EIA") and the Environmental Protection Agency ("EPA") make regarding U.S. coals.

4. In fact, this study concludes that ICF assumed carbon coefficients for U.S. coals which are higher than documented by EIA in its sole referenced source. Further, an independent analysis of the carbon coefficients of the producing U.S. coal mines in the Powder River Basin and Uinta Basin (which are the coals that could be exported through MBT-Longview) demonstrates that the actual carbon coefficients are less than assumed by ICF and less than the comparable subbituminous Indonesian coals which this coal would displace.
5. ICF does not make clear that it assumed that U.S. coals would be higher-emitting coal than their Asian counterparts and that this assumption would result in GHG emission impacts due to the proposed action. ICF briefly stated that "GHG emissions from coal combustion include those associated with market effects [and] … also reflect coal substitution, which is driven by the difference in carbon content between Powder River Basin coal, Uinta Basin coal, and coals produced in the Pacific Basin."[4]
6. ICF's flawed assumption that U.S. coals have higher carbon coefficients than other Asian coals accounted for 42% of the total increase in GHG emissions from coal combustion under the 2015 Energy Policy Scenario.

This memorandum is intended to address the lack of foundation for the critical assumption of carbon coefficients for U.S. and Pacific Basin coals (one of two main inputs) and to provide better data for these carbon coefficients.

ICF's Inaccurate and Inadequate References for Carbon Coefficients

As ICF states, "To estimate the CO_2 emissions from coal combustion, two main inputs are required. These inputs are (1) the amount of coal consumed in trillion Btu and (2) the carbon content, in pounds per million Btu, of the coal being consumed."[5] ICF assumed that the carbon content of U.S. coals exported through MBT-Longview would be higher than the Pacific Basin coals which these coals would displace.[6] Because of this assumption, ICF concluded that MBT-Longview would result in increased CO_2 emissions even if there were no increase in coal combustion in the Pacific Basin due to exports from MBT-Longview.

ICF's assumptions as to the heat content and carbon emission coefficients are shown below.[7] These carbon coefficients are presented by ICF in multiple documents, including "Coal Market Analysis, Modeling Assumptions" at Coal Characteristics, SEPA Greenhouse Gas Emissions Technical Report at Table 31, and SEPA Coal Market Assessment Technical Report at Table 17.

[4] ICF SEPA Greenhouse Gas Emissions Technical Report, page 2-32.
[5] ICF SEPA Coal Market Assessment Technical Report, page 4-12.
[6] *Ibid.*
[7] The columns showing heat content in Btu/pound and in kcal/kg are calculated from the mmBtu/ton and shown for convenience.

Source	Coal Type	Heat Content (MMBtu/ton)	CO_2 (lb/MMBtu)	Heat Content (Btu/pound)	Heat Content (kcal/kg)
PRB – WY	Sub	17.6	214.3	8,800	4,889
PRB – MT	Sub	18.6	215.5	9,300	5,167
Uinta – CO	Bit	21.5	209.6	10,750	5,972
Uinta – UT	Bit	23.4	209.6	11,700	6,500
Australia	Bit	24.1	205.3	12,050	6,694
Indonesia	Bit	23.7	205.3	11,850	6,583
Indonesia	Sub	19.44	212.7	9,720	5,400
China	Bit	20.88	205.3	10,440	5,800
China	Lig	9.79	215.4	4,895	2,719

ICF did not provide an accurate citation for the assumed carbon emission factors for domestic or international coals. In the SEPA GHG Technical Report, there is no source provided at all for Table 31, which merely references the ICF SEPA Coal Market Technical Report. The Modeling Assumptions document provides the following citation for this table: "Source: EPA Base Case IPM v5.13 for domestic coals and EIA CO_2 Emission Factors for Coal study for international coals (1994, B.D. Hong and E. R. Slatick)." Virtually the same reference is listed in the SEPA Coal Market Assessment Technical Report: "Hong, B.D. and E.R. Slatick. 1994. EPA Base Case IPM® v5.13 for Domestic Coals and EIA CO_2 Emissions Factors for Coal Study for International Coals. Energy Information Administration, *Quarterly Coal Report*: 1–8."

However, the link to the referenced article shows that the EIA 1994 article by Hong & Slatick (which is still available on the EIA website) shows no information at all about the carbon emission factors of international coal.[8] The carbon emission factors relied upon by ICF do not match the factors provided in the referenced article and all of the emission factors used by ICF are greater than the emission factors for U.S. coals from Wyoming, Montana, Colorado and Utah reported by EIA.[9]

Further, the carbon emission factors for U.S. coals which ICF used in the SEPA analysis have different values from the carbon emission factors used by EPA for calculating CO_2 emissions from coal combustion,[10] which is based upon EIA emission factors.[11] Both EPA and EIA use one common emission factor for U.S. coals by rank and do not differentiate by the coal location. Neither EPA nor EIA provide emission factors for international coals.

The carbon coefficients used by ICF in the Draft EIS are much different from the factors which it references from EIA and EPA, as shown below. ICF has assumed much higher carbon coefficients for U.S. coals than stated in the published references, which resulted in greater GHG emission impacts in the Draft EIS.

[8] http://www.eia.gov/coal/production/quarterly/co2_article/co2.html
[9] Hong, B.D. and E.R. Slatick. 1994.
[10] [5]U.S. EPA, AP 42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, http://www.epa.gov/ttn/chief/ap42/ch01/final/c01s11.pdf.
[11] U. S. Energy Information Administration, Documentation for Emissions of Greenhouse Gases in the United States 2008, DOE/EIA-0638 (2006), October 2008, Table 6-2, p. 183.

			CO2 Factor (lb/mmBtu)		
Basin	State	Coal Type	Draft EIS	EIA 1994	EIA 2008
PRB	WY	Subbituminous	214.3	212.7	214.2
PRB	MT	Subbituminous	215.5	213.4	214.2
Uinta	CO	Bituminous	209.6	206.2	205.6
Uinta	UT	Bituminous	209.6	204.1	205.6
Indonesia		Subbituminous	212.7		
Australia		Bituminous	205.3		
Indonesia		Bituminous	205.3		

As shown above, ICF assumed that the CO_2 emission factor for Indonesian coals, expressed in pounds per mmBtu, would be 212.7 for subbituminous coal and 205.3 for bituminous coal. ICF assumed the same emission factor for both Australian and Indonesian bituminous coal (not varying the carbon coefficient with the location in Asia, as it did in the United States). By using these emission factors, ICF assumed that U.S. coal exported through MBT-Longview would result in increased GHG emissions of 2.1% for bituminous coal or 0.8% - 1.3% for subbituminous coal, even if the same amount and rank of U.S. coal were substituted for Pacific Basin coal.

Carbon Coefficients for U.S. Coals

EVA has performed a study of the carbon coefficients for U.S. coal, based upon actual coal mine quality provided by the mines which are the largest producers of coal in the Powder River and Uinta Basins. While there is a range of coal quality among the different mines, the average coal quality is very consistent with the original 1994 EIA study.[12] These carbon coefficients are significantly lower than those assumed by ICF in the Draft EIS for all of the U.S. coal types.

[12] Hong, B.D. and E.R. Slatick. 1994.

Carbon Coefficients for U.S. Coals[13]

Basin	State	Type	Company	Mine	2015 Prod. mm tons	As-Received Quality Carbon	As-Received Quality Btu/lb	CO2 lb/mmBtu
PRB	MT	Sub	Cloud Peak	Spring Creek	17.0	54.10%	9,350	212.2
PRB	MT	Sub	Lighthouse Resources	Decker	3.0	53.50%	9,500	206.5
PRB	WY	Sub	Alpha Coal West	Belle Ayr	18.3	49.74%	8,600	212.1
PRB	WY	Sub	Alpha Coal West	Eagle Butte	19.7	48.03%	8,334	211.3
PRB	WY	Sub	Arch Coal	Black Thunder	99.5	51.10%	8,903	210.5
PRB	WY	Sub	Arch Coal	Coal Creek	7.8	47.44%	8,329	208.9
PRB	WY	Sub	Cloud Peak	Antelope	35.2	51.67%	8,800	215.3
PRB	WY	Sub	Cloud Peak	Cordero Rojo	22.9	49.22%	8,400	214.9
PRB	WY	Sub	Peabody	NARM	109.3	51.62%	8,800	215.1
Uinta	CO	Bit	Arch Coal	West Elk	5.1	64.29%	11,406	206.7
Uinta	CO	Bit	Bowie Resources	Bowie #2	1.0	67.78%	12,110	205.2
Uinta	UT	Bit	Bowie Resources	Dugout Canyon	0.8	66.08%	11,804	205.3
Uinta	UT	Bit	Bowie Resources	Skyline	4.4	64.75%	11,569	205.2
Uinta	UT	Bit	Bowie Resources	Sufco	6.0	60.90%	10,761	207.5
Averages								
PRB	MT	Sub			20.0	54.01%	9,372	211.3
PRB	WY	Sub			312.7	50.84%	8,751	213.1
Uinta	CO	Bit			6.1	64.88%	11,524	206.5
Uinta	UT	Bit			11.2	62.77%	11,150	206.5
					349.9			

The Montana PRB coal has slightly lower CO_2 emission factors than Wyoming PRB (211.3 vs. 213.1) due to its higher rank (heat content averaging 9,372 Btu/pound compared to 8,751 Btu). As ICF itself states, "Wyoming coalfields have produced about 91% of Power River Basin coal, with the remaining 9% produced in Montana. However, because Montana coal has a higher heat content, it is more likely to be exported."[14] Thus, the U.S. subbituminous coal which is likely to be exported through MBT-Longview has a carbon coefficient of only 211.3 pounds per mmBtu, 1.9% less than the value of 215.5 pounds per mmBtu assumed by ICF in the Draft EIS.

Carbon Coefficients for Indonesian Coals

Indonesia has rapidly become the world's largest exporter of thermal (also called "steam") coal, which is coal burned for its heat content, rather than coal used in steel-making. This type of thermal coal will be exported through MBT-Longview (U.S. metallurgical coals are only produced in Appalachia). ICF understates the importance of Indonesia in its Coal Market Assessment, because it ranks countries by their total coal exports in 2012, not just their thermal coal.[15] Because Australia

[13] 2015 coal production data from the U.S. Mine Safety and Health Commission at www.msha.gov/drs; coal quality data provided directly from U.S. coal producers.
[14] ICF SEPA Coal Market Assessment Technical Report, page 2-4.
[15] ICF SEPA Coal Market Assessment Technical Report, Table 10, page 3-2.

exports large amounts of metallurgical coal, it is not nearly as important in the analysis of MBT-Longview's coal exports as presented by ICF.[16]

There is a wide range of coal quality exported from Indonesia, including bituminous, subbituminous and lignite coals. Each coal has a specific coal quality, but there are general Indonesia coal quality specifications which are quoted and traded in the market. There are coal industry trade publications which produce price indexes for coals traded in the world market. Each price index is for a country of origin and a coal quality typical of coal exported from that country.

Two of the sources of Pacific Basin coal prices cited by ICF in its analysis are IHS McCloskey and Platts.[17] These companies publish regular assessments of coal prices for a variety of coals sold in the international market. Both companies publish marker prices for Indonesian coal exported to the world market. The heat content for the Indonesian coals, published by McCloskey and Platts is shown below:

Indonesian Coal Market Price Specifications[18]

	IHS McCloskey			Platts		
Coal Type	**kcal/kg**	**Basis**	**GAR**	**kcal/kg**	**Basis**	**GAR**
Bituminous	6,000	NAR	6,300	5,900	GAR	5,900
Bituminous	5,500	NAR	5,775			
Subbit.	4,700	NAR	4,935	5,000	GAR	5,000
Subbit.	4,200	GAR	4,200	4,200	GAR	4,200
Subbit.	3,800	GAR	3,800	3,800	GAR	3,800

The Indonesian subbituminous and bituminous coals traded in the world market have lower heat content than U.S. coal with the same rank which would be exported through MBT-Longview and, as a result, are likely to have higher carbon emission coefficients than U.S. coal (more CO_2 emitted per the same amount of heat produced), not lower coefficients, as assumed by ICF. As a result, there would be lower GHG emissions from the substitution of U.S. coal exports through MBT-Longview, not higher emissions, as assumed by ICF.

The detailed coal quality data for operating Indonesian mines needed to calculate the carbon emission coefficients is not as readily available in the market as it is for U.S. coals. The data needed include the heat content (expressed in Btu/pound or kcal/kg) and the ultimate analysis, which provides the carbon content of the coal. The CO_2 emission factor in pounds per mmBtu can be determined by multiplying the carbon content by 36,670 divided by the heat content in Btu/pound.[19]

The United States Geological Survey ("USGS") managed the World Coal Quality Inventory to collect and analyze a global set of samples of mined coal during a time period from 1995 to 2006.

[16] International Energy Agency, "Coal Information 2015", Table II.10.
[17] ICF SEPA Coal Market Assessment Technical Report, Figure 14, page 3-8.
[18] The kcal/kg specification is published by IHS McCloskey and Platts on either a gross or net basis as shown. The NAR specification is converted to a GAR equivalent using a factor of 1.05. Sources: IHS Energy Thermal Coal and Petcoke Marker Price Methodology and Specifications, May 2016 and Platts Coal Methodology and Specifications Guide, May 2016.
[19] Hong, B.D. and E.R. Slatick. 1994 at 11.

The data set provides complete analyses of coal quality from 1,580 samples from 57 countries.[20] The coal quality data provide both the carbon content and the heat content, enabling the calculation of the CO_2 emission factor, using the formula provided by Hong and Slatick as described above. The individual mine coal quality and the simple average (not all production data is available) are shown below.

Indonesian Coal Quality Specifications[21]

					As-Received Quality		CO2
Country	**State**	**Type**	**Company**	**Mine**	**Carbon**	**Btu/lb**	**lb/mmBtu**
Indonesia	Sumatra	Bit			73.16%	13,203	203.2
Indonesia	Sumatra	Sub			50.69%	8,610	215.9
Indonesia	Sumatra	Bit			62.37%	11,326	201.9
Indonesia	Kalimantan	Sub			48.38%	8,302	213.7
Indonesia	Kalimantan	Bit	Kaltim Prima	Sangatta	57.47%	10,049	209.7
Indonesia	Kalimantan	Bit	Arutmin	Senakin	63.69%	11,683	199.9
Indonesia	Kalimantan	Sub	Adaro Energy	Envirocoal	51.89%	9,000	211.4
Indonesia	Kalimantan	Sub	Arutmin	Ecocoal	45.04%	7,598	217.4
Averages							
Indonesia		Sub			49.00%	8,377.5	214.6
Indonesia		Bit			64.17%	11,565.3	203.7

The average CO_2 emission factor for the Indonesian subbituminous coals in this data base is higher than the average emission factor assumed by ICF in the Draft EIS (214.6 pounds per mmBtu vs. 212.7 pounds per mmBtu) and is higher than the emission factors for U.S. subbituminous coals (211.3 – 213.1 pounds per mmBtu). The emission factors for Indonesian bituminous coals show a wide range; while the simple average is less than the emission factor for Uinta Basin coals, the difference is not statistically significant.

[20] Chemical Analyses in the World Coal Quality Inventory, Version 1, available at http://pubs.usgs.gov/of/2010/1196/.
[21] World Coal Quality Inventory data at http://energy.usgs.gov/Coal/AssessmentsandData/WorldCoalQualityInventory.aspx#3906272-data.

Significance of ICF's Assumption of Coal Carbon Coefficients

ICF's assumption that U.S. coals that would be exported through MBT-Longview have higher carbon coefficients than the Pacific Basin coals which they would displace has a major impact on ICF's conclusion that MBT-Longview will result in increased GHG emissions from coal combustion in the Pacific Basin. In the 2015 Energy Policy Scenario, ICF concludes that the increased GHG emissions in the year 2028 from "coal substitution" (U.S. coal replacing the same amount of Pacific Basin coal, in total mmBtu) will be 1,171,889 metric tons, which is greater than the increased GHG emissions from "induced demand" (the increased use of coal in the Pacific Basin due to lower coal prices), which would be only 867,958 metric tons. For the full 20-year period (2018 – 2038), the increased GHG emissions from coal substitution in ICF's flawed analysis are predicted to be 42% of the total increased emissions in the Pacific Basin (8,856,189 out of 21,262,771 total metric tons).[22]

This analysis shows that carbon emission coefficients from subbituminous coal exported through MBT-Longview are likely to be ***lower*** than the Indonesian subbituminous coal that it would displace in the Pacific Basin, not ***higher*** as erroneously assumed by ICF. Thus, the impact of "coal substitution" due to coal exports through MBT-Longview is likely to ***reduce*** GHG emissions in the Pacific Basin, not increase emissions as projected by ICF.

[22] ICF SEPA Greenhouse Gas Emissions Technical Report, Table 47, page 3-9.

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COALCAST

FUELCAST

June 12, 2016

TO: Millennium Bulk Terminal-Longview

FROM: Seth Schwartz

RE: Substitution of Subbituminous Coal for Bituminous Coal in Asia

Summary and Conclusions

EVA was requested by Millennium Bulk Terminal ("MBT-Longview") to review the results of ICF's model forecasting the impacts of substitution of U.S. coals for Asian coals in the Pacific Basin market due to exports from MBT-Longview. Our analysis was based upon a review of ICF's Draft SEPA EIS reports (Coal Market Assessment and Greenhouse Gas Emissions Technical Reports). Based upon this review, we have reached the following conclusions:

1. While acknowledging that boilers that were designed for bituminous coal may not be able to use subbituminous coal, ICF assumed that subbituminous coal could substitute for bituminous coal up to 30% of the total thermal coal imports by country. ICF provided no basis for this assumption.
2. ICF's model projected that all of the coal exports through MBT-Longview would be shipped to Japan, and that all of these exports would be subbituminous Powder River Basin (PRB) coal through at least 2028.
3. There is already a large market price discount for subbituminous coal from Indonesia compared to bituminous coal, so customers have the economic incentive to maximize their use of subbituminous coal already.
4. The imports of subbituminous coal to Japan are only 7% of the total in 2015 (by weight). This implies that the power plants in Japan are not able to switch to U.S. PRB coal up to 34% of total imports (by weight), as projected by ICF's model.
5. ICF did not disclose sufficient detail on the model results, including coal origin, destination, and prices, for a proper understanding and critique.

This memorandum is intended to address the lack of basis for ICF's model assumptions and results. Key conclusions are:

1. A more reasonable model result would be that MBT-Longview exports of subbituminous coal would substitute for Indonesian subbituminous coal, not bituminous coal from Indonesia and Australia. There are large volumes of Indonesian subbituminous (and lignite) exports in the market today, which already sell at a discount.
2. The importance of this unsupported and incorrect assumption is that GHG emissions are predicted to be higher in the 2015 Energy Scenario by allowing U.S. subbituminous coal to substitute for Asian bituminous coal.
3. In particular, ICF projects that all of the coal from MBT-Longview will be delivered to Japan, whose existing plants only consume a limited amount of subbituminous coal due to coal quality limitations. Subbituminous coal provides only 7% (by weight, even less by heat content) of the 2015 thermal coal imports to Japan, while ICF's model projects this will jump to 34% by weight due to exports from MBTL.

ICF Did Not Disclose Its Model Results in Sufficient Detail to Evaluate Coal Substitution

ICF recognized that "coal plants designed to burn bituminous coal have boilers that are too small to burn 100% subbituminous coal. However, bituminous coal plants are typically able to mix some subbituminous coal along with the bituminous coal they consume."[1] Because the GHG emission rate of subbituminous coal is significantly higher than for bituminous coal in ICF's input assumptions, the substitution of subbituminous coal for bituminous coal is a critical factor in predicting the GHG emissions from coal substitution.

ICF states that:

1) It limited the subbituminous coal consumption in the countries of Japan, South Korea, Taiwan and Hong Kong to no more than 30% of the coal consumed in trillion Btu;[2]
2) Depending on the scenario, most or all of the projected coal exports through MBT-Longview are subbituminous coals;[3] and,
3) A large share of the predicted increase in GHG emissions is due to coal substitution rather than induced coal demand.[4]

ICF's Model Substitutes U.S. Subbituminous Coal for Asian Bituminous Coal

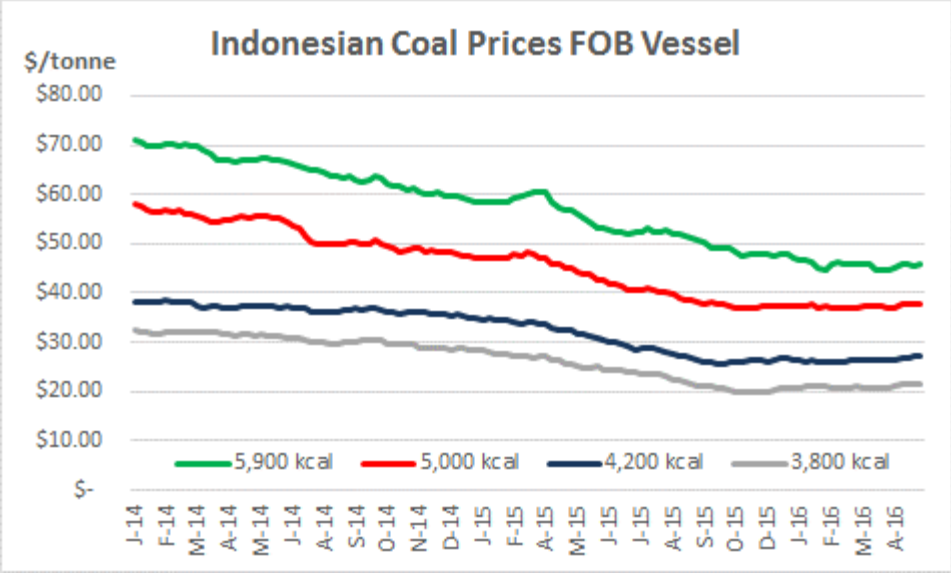
While the Draft EIS did not provide sufficient model results to quantify how much bituminous coal is projected to be replaced by subbituminous coal, it is clear that this shift is occurring from the summary data. In the Energy Policy Scenario, all of the MBT-Longview exports are projected to be shipped to Japan, because it is the closest destination. The exports are 44 mm metric tpy for every model year (2025, 2030 and 2040).[5] The total coal imports to Japan are projected to be 129 mm tons in 2025, declining to 125 mm in 2030 and 116 mm in 2040. Through 2028, all of the exports

[1] ICF SEPA Coal Market Assessment Technical Report, page 4-12.
[2] *Ibid.*
[3] ICF SEPA Greenhouse Gas Emissions Technical Report, pages 4-2 to 4-6.
[4] *Id.* at page 3-9.
[5] ICF SEPA Coal Market Assessment Technical Report, Table 81, page 6-53

through MBT-Longview are projected to be subbituminous PRB coal.[6] Thus, PRB coal exports to Japan are projected at the maximum amount of subbituminous coal allowed by ICF at 30% of total coal consumption (34% by weight).

Imports of Subbituminous Coal Are Already Incented by Price

ICF's model projects that the increased supply of U.S. subbituminous coal through MBT-Longview will create an economic incentive for customers (primarily in Japan) to switch from bituminous coal to subbituminous coal at lower cost. However, there is a large difference in the market price for bituminous and subbituminous coals in the Pacific Basin in the current market. The difference is greater than simply the difference in the heat content and reflects the limitations that customers have in using subbituminous coal. The published market prices for Indonesian coals with different heat contents (bituminous 5,900 kcal/kg, subbituminous 5,000 and 4,200 kcal, and lignite 3,800 kcal) are shown below.[7]



Even with this economic incentive, the share of Indonesian subbituminous coal to Japan is only 7% of total thermal coal imports by weight (even lower by heat content). The total 2015 thermal coal imports to the Asian countries selected by ICF in its model are shown below. While 59% of thermal coal imports to Hong Kong are subbituminous coal from Indonesia, only 7% of Japan's imports are lower-cost subbituminous coals. This is evidence of the limitations on switching from bituminous coal to subbituminous coal in Japan, which would restrict the amount of PRB coal exports through MBT-Longview and the resulting price impacts in the Pacific Basin, which would also reduce the amount of induced coal demand.

[6] ICF SEPA Greenhouse Gas Emissions Technical Report, Table 55, page 4-2.
[7] Platts *Coal Trader International* weekly prices.

Thermal Coal Imports to Pacific Basin Countries, 2015 (million metric tons)[8]

Origin Country	China	Hong Kong	Japan	South Korea	Taiwan
Bituminous Coal					
Australia	43,537,806	224,998	94,350,433	37,589,437	31,092,244
Canada	-	153,870	2,621,240	3,387,761	1,299,745
China	-	64	566,413	791,551	328,056
Indonesia	28,115,448	3,226,703	22,158,776	13,556,762	15,431,751
Mongolia	1,618,332	-	3	28	-
Russia	9,780,372	934,184	11,503,973	16,584,380	7,466,105
South Africa	-	-	77,670	166,999	1,003,558
United States	425	-	2,290,336	1,226,190	320
Other	59,687	-	252,692	-	416,511
	83,112,070	**4,539,819**	**133,821,536**	**73,303,108**	**57,038,290**
Subbituminous & Lignite					
Indonesia	45,416,019	6,621,207	10,138,256	20,394,311	9,465,671
Other	2,835,023	-	-	-	-
	48,251,041	**6,621,207**	**10,138,256**	**20,394,311**	**9,465,671**
Total	**131,363,111**	**11,161,026**	**143,959,792**	**93,697,419**	**66,503,961**
Sub & Lignite	37%	59%	7%	22%	14%

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Memorandum: Review of Approaches for Significance and Mitigation

Prepared For:

June 13, 2016

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Executive Summary

This memorandum evaluates the approaches adopted in the Millennium Bulk Terminals-Longview Draft Environmental Impact Statement (Draft EIS) to assess GHG emissions and climate change under the State Environmental Policy Act (SEPA) framework.

The Draft EIS has not reliably identified any climate change effects on Washington State attributable to the Project based on the SEPA framework. The Draft EIS is largely silent on this issue and forms its conclusions principally based on the Project's GHG emissions. While it states that the Project's GHG emissions represent a significant impact, the Draft EIS does not show how these impacts have been determined or establish a causation link between the Project's GHG emissions and the supposed environmental impacts in Washington State that would not otherwise occur under the No Action Alternative.

The Draft EIS's conclusions are contradictory in that it also separately determines that climate change impacts on the No-Action Alternative would be the same as those on the Project, a tacit acknowledgment that climate change effects are the same irrespective of the operation of the Project.

The Draft EIS also avoids any discussion or acknowledgement that it is not possible - with any degree of confidence - to attribute potential local or state-level climate change impacts to project-level GHG emissions given the scale, complexity, and uncertainty inherent in current modeling and data analytical techniques.

The Draft EIS has relied on the use of GHG emissions as a representation of climate risk but does not offer context or support for adopting this approach and its conclusions are unsubstantiated. Furthermore, it has significantly overestimated the total net emissions and has used inapplicable regulatory drivers as emissions thresholds as a basis for determining significance.

The mitigation approach of the Draft EIS is unsupported and contradictory because it is not possible to attribute local or state-level climate change impacts to project-level GHG emissions, rendering the mitigation measures unnecessary and inappropriate. Consistent with SEPA, mitigation must be linked to adverse environmental impacts that would not otherwise occur in the absence of a proposed action. The Draft EIS does not describe what is being mitigated or what the mitigation measures are attempting to address.

1.0 INTRODUCTION

Millennium Bulk Terminals-Longview, LLC (MBT-Longview) retained Environmental Resources Management, Inc. (ERM) for expert consulting services related to potential greenhouse gas (GHG) emissions and climate change impacts associated with the proposed MBT-Longview export facility (Project) located in Longview, Washington.

This memorandum discusses and critiques the approaches adopted in the Millennium Bulk Terminals Draft Environmental Impact Statement (Draft EIS) (Ecology and Cowlitz County 2016) to assess GHG emissions and climate change.

2.0 STATE ENVIRONMENTAL POLICY ACT

Under the State Environmental Policy Act (SEPA), a primary purpose of an environmental impact statement (EIS) is to provide an impartial discussion of significant environmental impacts and present mitigation measures that avoid or minimize identified adverse environmental impacts. The identified adverse environmental impacts must be attributable to a proposed action, and would not occur in the absence of the proposed action.

With respect to GHG emissions and climate change, determining impacts is complex. A proposed action may directly or indirectly[1] emit GHGs; however the emissions themselves do not constitute the impact. Instead, the potential for adverse impacts is manifested through potential changes in climate.

Considering this functional relationship, an EIS must identify adverse impacts to the environment attributable to climate change, and proposed action-level emissions must be determined to be the cause of these adverse impacts. If not, there can be no determination made on the impact of the proposed action because the assessment is inconclusive and speculative.

3.0 DETERMINATION OF IMPACTS

3.1 Draft EIS Conclusions

The Draft EIS does not identify or sufficiently demonstrate any adverse climate change impacts on Washington State attributable to the Project. In fact, the Draft EIS is largely silent on this issue, and forms its conclusions principally based on the Project's GHG emissions. The Draft EIS concludes that the GHG emissions are significant impacts;[2] however these conclusions are unsubstantiated and unreliable, for the following reasons:

i. The Draft EIS does not identify and describe the nature of the stated impacts, including:
   - How the GHG emissions themselves are considered impacts?
   - What the actual impacts are – in what shape or form are these impacts manifesting themselves?
   - The specific effects these impacts would cause on Washington State.

ii. The Draft EIS offers no evidence or supporting logic as to how it has established the causation link between the Project's GHG emissions and the supposed impacts. The Draft EIS uses inapplicable regulatory thresholds as a basis for determining the significance of the GHG emissions, but this is unlinked to impacts.

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[1] Direct GHG emissions are those emissions from sources that are under the ownership or control of the entity responsible for the proposed action. Indirect GHG emissions are emissions that are a consequence of the activities of the proposed action, but occur at sources owned or controlled by another entity. A lifecycle approach to GHG emissions involves assessing all direct and indirect GHG emissions across the lifecycle of the proposed action.

[2] The Draft EIS concludes that "*…the emissions are considered to be significant impacts. The climate change impacts resulting from this increase to greenhouse gases would persist for a long period of time, beyond the analysis period and are considered permanent and, while global in nature, would affect Washington State*." (see section 5.8.1.6, page 5.8-16, Draft EIS). In addition, the Draft EIS concludes that the "*emissions attributable to operations of the Proposed Action (MBT-Longview) under the Energy Policy Scenario are considered adverse and significant.*" (see section 5.8.1.6, page 5.8-16 to 5.8-17, Draft EIS).

iii. The Draft EIS's conclusions are contradictory. Section 5.8.2.5 of the Draft EIS determines that climate change impacts on the No-Action Alternative would be the same as those on the Project.[3] This implies that climate change effects are the same irrespective of the operation of the Project.

iv. Where future potential climate change effects in Washington State are described in the Draft EIS (in section 5.8.2), there is no linkage of these effects to the Project. The Draft EIS presents this commentary with no specific statement or conclusion that these climate change effects are due to, or in part attributable to, the Project. In fact, section 5.8.2 references publications and information sources that pre-date the Draft EIS and is specifically focused on assessing the future climate change effects *on the* Project, rather than assessing the effects *from the* Project.

3.2 Inherent Difficulties Linking Project-level GHG Emissions to Climate Change

It is not possible with any degree of confidence to attribute potential project-level GHG emissions to any local climate change impacts consistent with SEPA. This is due to both the nature of the functional relationship between GHGs and climate change, and also the level of resolution available from modeling and analytical approaches in use today.

Functional relationship between GHGs and climate change

Changes in the Earth's climate depend on the balance between energy entering and leaving the Earth's system, and a number of both natural and human factors can affect the energy balance,[4] including changes in:

- The amount of energy from the sun reaching the Earth;
- The reflectivity of Earth's atmosphere and surface; and
- GHG[5] concentrations which affect the amount of heat retained by Earth's atmosphere, i.e. the greenhouse effect.

All three of these factors occur at a global level. In the case of GHG concentrations, while the emission of GHGs can occur at a local level, the functional linkage between climate change effects and the concentration of GHGs happens as a global phenomenon, as follows:

1. GHG emissions may occur at a local level, whether through a natural event, or through a human-induced activity;
2. The local-level GHG emissions contribute to the overall global atmospheric concentration of GHGs;

[3] Section 5.8.2.5, page 5.8-33, Draft EIS.

[4] See https://www3.epa.gov/climatechange/science/causes.html for a more detailed description.

[5] GHGs comprise a number of different gases, such as carbon dioxide, methane, nitrous oxide (N2O), and chlorofluorocarbons (CFCs), as well as water vapor and ozone. Many of these can result from both natural and human activities, and when assessed for a proposed action, the emissions attributable to human activities are typically calculated. Carbon dioxide equivalent (CO_2e) is a measure used to compare the emissions from various greenhouse gases based upon their global warming potential, and CO_2e is commonly used as a metric to sum GHG emissions.

3. The global concentration of GHGs results in a warming effect, by absorbing long-wave energy emitted from the Earth's surface, preventing its immediate escape from the Earth's system, and then re-emitting this energy, warming the Earth's surface and lower atmosphere.
4. The warming effect causes the temperature of the surface to increase, which then causes changes to the drivers of the global climate patterns as a whole; and
5. The climate is changed globally, with differential changes of temperature, precipitation, storm intensity, wind profiles, and other effects experienced in different regions across the Earth.

The substantial differences in the magnitude between local level GHG and the global GHG concentrations contributes to the difficulty of seeking to understand and assess potential climate change impacts of project-level activities. For example:

- Typical project-level emissions can be of the order of thousands or millions of metric tons of CO_2e;
- Global annual emissions are at the level of billions of metric tons of CO_2e;[6] and
- The global carbon dioxide concentration recorded in March 2016 was 404 parts per million (ppm) (NOAA/ESRL 2016), which equates to 3,153 billion metric tons (giga tons or Gt) carbon dioxide.[7]

As described above, the differences in scale between GHG emissions at a local level and the climate change impacts driven by the overall global atmospheric concentration of GHGs create a natural disjunction between localized effects resulting from the global accumulation of GHGs over the course of many decades. This disjunction is reflected in the uncertainties inherent in current climate change modeling.

Resolution of Modeling and Analytical Approaches

Linking project-level emissions to climate change effects is not possible based upon current scientific, meteorological, and statistical methods and models. General Circulation Models (GCMs) are the best available tools for simulating the response of the global climate system to increasing GHG concentrations. GCMs are built and run at a global level, and are used to project future changes in climate on the basis of differing GHG emissions scenarios. GCMs are complicated numerical models representing physical processes in the atmosphere, ocean, cryosphere and land surface, and they are at a scale that is too large to allow individual project assessments.

For example, the latest Intergovernmental Panel on Climate Change (IPCC) projections assume a series of cumulative GHG emission scenarios ranging from 510 to 7,010 Gt CO_2,[8] compared to the Draft EIS estimate of total lifecycle GHG emissions for the Project's life span (2018–2038) of 0.038 Gt (37,590,823 metric tons) of CO_2e.[9] The Draft EIS emissions represent between 0.007 to 0.0005% of the IPCC emission scenarios, which is non-detectable in the GCMs recognizing the inherent uncertainty. Furthermore, the projected climate change

[6] Annual global GHG emissions reached 49.5 billion metric tons (giga tons or Gt) of CO_2e in the year 2010 (IPCC 2014a).

[7] Conversion using Common Conversion Factors from the Carbon Dioxide Information Analysis Center (http://cdiac.ornl.gov/pns/convert.html#3). Accessed May 30, 2016.

[8] Table SPM.1, page 13, IPCC 2014b.

[9] Taken from Table 5.8-8 of the Draft EIS.

effects that the GCMs generate are relatively small compared to the global GHG emission scenarios. The IPCC cumulative GHG emission scenarios ranging from 510 to 7,010 Gt CO_2 project temperature changes of the range 1.5 to 4.8 degrees Celsius.[10] The GCMs would not be able to detect statistically significant temperature changes attributable to the Draft EIS GHG estimates which are 4-5 orders of magnitude less.[11] GCMs cannot be run to assess differences attributable to a single project.

Future climate is determined as a function of these physical interacting processes, and while man-made GHG emissions are external to the climate system, they modify how it behaves. Future climate is shaped by the Earth's response to man-made GHG contributions, along with internal variability inherent in the climate system. The range of GCMs provide differing representations of the Earth's response to man-made contributions and of natural climate variability. Ensembles of GCMs, simulating the response to a range of different scenarios, map out a range of possible future projections, and help provide understanding on associated uncertainties. For example, the IPCC latest projections have been assembled from up to 39 different GCMs.[12] The diversity of various modeling options for the climate system represents a positive aspect of climate modeling, and results in a range of climate change projections at global and regional scales. This diversity provides a basis for quantifying uncertainty in the projections. This uncertainty is inevitable and reflects the complexity of the climate system and the fact that different GCMs have different strength and weaknesses. Other sources of uncertainty stem from GCMs' structural limitations in that they are not built in a 'bottom up' manner which assumes a universe of projects. Rather, they are top-down models which assume different future emissions trajectories based on different GHG emissions scenarios.

Downscaling is a strategy for generating regional data from GCMs. The intent of downscaling is to link global scale projections and regional dynamics to generate regionally specific projections. The global scale at which GCMs are constructed means they create uncertainty when outputs are used to assess local level effects. Downscaling still relies on the primary GCM data and therefore outputs remain estimations, and the process of downscaling adds an additional tier of uncertainty. If more localized impacts are then to be assessed from the downscaled outputs, a further level of assessment is needed to link the downscaled climate responses to local physical or ecological processes, further adding uncertainty to the projections. Therefore, while GCM and downscaled climate change projections represent the best projections currently available, they need to be viewed and used with caution in light of the associated uncertainty.

For these reasons, it is not possible to determine the climate change impacts attributable to local level GHG emissions.

3.3 Summary

The Draft EIS has not reliably identified any climate change effects attributable to the Project under the SEPA framework. While it states that the Project's net GHG emissions represent a significant impact, the Draft EIS

[10] Table SPM.1, page 13, IPCC 2014b.

[11] Orders of magnitude are used to make approximate comparisons between numbers. Numbers that differ by one order of magnitude differ in quantity by about ten times. Numbers that differ by two orders of magnitude differ by a factor of about 100, etc.

[12] Figure TS.5, page 58, IPCC 2014c.

fails to explain how these impacts have been determined or establish a causation link between the Project's GHG emissions and the supposed environmental impacts in Washington State that would not otherwise occur under the No Action Alternative. The Draft EIS's conclusions are also contradictory in that they separately conclude climate change impacts on the No-Action Alternative would be the same as those on the Project, tacitly acknowledging that climate change effects are the same irrespective of the operation of the Project. Because it is not possible - with any degree of confidence - to attribute potential local or state-level climate change impacts to project-level GHG emissions given the scale, complexity and uncertainty inherent in current modelling and data analytical techniques, the Draft EIS, or any EIS for that matter, cannot reliably identify local climate change impacts attributable to GHG emissions from the Project.

4.0 USING GHG EMISSIONS AS A REPRESENTATION OF CLIMATE IMPACTS

As described in section 3.0, the Draft EIS has not demonstrated any climate change impacts that are attributable to the Project under the requirements of SEPA and is largely silent on this issue. Instead, the Draft EIS appears to be relying on the principle of using GHG emissions as a representation of climate risk and forms its conclusions principally in relation to the Project's GHG emissions. This approach is also unsubstantiated and inconclusive, as discussed below.

4.1 Overestimation of Project GHG Emissions

The Draft EIS presents a lifecycle assessment of GHG emissions attributable to the Project and presents total net GHG emissions[13] as shown in Table 1.

TABLE 1 DRAFT EIS TOTAL NET EMISSIONS[14]

Period	Emissions (metric tons of CO2e) for 2015 Energy Policy[15]
Annual Emissions, 2028	3,231,025
Total Emissions, 2018–2038	37,590,823

These presented emissions significantly overestimate the total net emissions attributed to the Project for the following reasons:

- The Draft EIS's coal market analysis contains a number of fundamental problems which result in an overestimation of the lifecycle GHG emissions attributable to the Project as follows:

[13] The lifecycle assessment of GHG emissions attributable to the Project is intended to identify the net incremental GHG emissions. This means that GHG estimates should account for emissions attributable to the Project, as well as those emissions that will be reduced or removed as a consequence of the Project (i.e. offsets).

[14] Taken from Table 5.8-8 of the Draft EIS.

[15] The 2015 Energy Policy scenario is selected in the Draft EIS as the preferred scenario for the GHG analysis.

  - It assumes elasticity of demand which implies additional coal demand in the Pacific basin would be induced by the Project, which in turn would increase the GHG emissions attributable to the Project. This assumption is unsubstantiated and unreliable.
  - It incorrectly assumes that heat contents of Asian coals are higher than coal to be imported through the Project, thereby assuming more United States (U.S.) imported coal is required to displace Asian coal.
  - It incorrectly assumes that the CO_2 content of Asian coals is lower than coal to be exported through the Project, thereby assuming more emissions associated with U.S. coal that displace Asian coal.
  - It assumes that a U.S. policy instrument (namely, the Clean Power Plan) eliminates any U.S. coal market dynamics attributable to the Project, such as coal displacement by natural gas.
- The Draft EIS does not account for potential GHG offsets linked to rail transportation attributable to a reduction in current U.S. coal transportation (due to substitution by natural gas) and a reduction in Indonesian land and barge transport (due to displacement). The Draft EIS may overestimate rail emissions by up to 50%.

The level of overestimation of the total net lifecycle emissions attributed to the Project could be as high as an order of magnitude. Correcting the erroneous assumptions in the Draft EIS would likely result in negligible net or negative GHG emissions from Pacific basin coal combustion, potentially as low as a negative 60,000,000 metric tons of CO_2e emissions. Instead, the Draft EIS assumes between 50-55%[16] of the net GHG emissions are due to end-use combustion. In sum, the Draft EIS has not presented a reliable assessment and determination of the GHG emissions attributable to the Project.

4.2 Use of Inappropriate Threshold for Determining Significance

Using GHG emissions as a representation for climate risk is sometimes adopted in recognition of the complexity and uncertainty with trying to determine causation between GHG emissions and climate effects. The Draft Council on Environmental Quality (CEQ) guidance (CEQ 2014) recognizes this challenge and recommends using GHG emissions as a representation. However, the Draft CEQ Guidelines remain in draft form, and have not been legally adopted, and must therefore be acknowledged within this context. Furthermore, it is noted that the guidelines are not consistently applied by agencies on projects, and where they are used, differing interpretations have been applied.

The Draft EIS concludes that the GHG emissions attributable to the Project are significant, based on GHG thresholds from inapplicable regulations[17] as follows:

- Draft Washington State Clean Air Rule.
- Draft CEQ Guidelines.

[16] The net annual GHG emissions and total net emissions associated with combustion have been summed from the 2015 Energy Policy values from Table 5.8-5 of the Draft EIS, and the percentage determined by dividing by the respective total net emissions shown in Table 5.8-8.

[17] Section 5.8.1.6, page 5.8-16, Draft EIS.

- United States Environmental Protection Agency's (U.S. EPA) Tailoring Rule (40 Code of Federal Regulations [CFR] Parts 51, 52, 70 et al.).

The Draft EIS states that "*(t)hese standards provide guidance on assessing significance of various levels of greenhouse gas emissions*" and concludes that the average annual amount of emissions for operations (broken down for initial and full operations)[18] "*….exceeds various intensity considerations that are proposed in federal and state regulations and guidance*."[19] In turn, the Draft EIS concludes that the "*emissions attributable to operations of the Proposed Action (MBT-Longview) under the Energy Policy Scenario are considered adverse and significant.*"[20]

There are four primary concerns with the Draft EIS's approach to determining significance by using GHG emissions as a representation of risk and compared to thresholds, as follows:

1. ***The projected total net GHG emissions have been significantly overestimated***

   As noted in Section 4.1, the projected emissions are significantly overestimating the total net emissions attributed to the Project, and this level of overestimation could be as high as an order of magnitude. The scenarios evaluated and assumptions applied by the Draft EIS each provided a very different estimate for GHG values, making clear that there is great uncertainty in predicting a GHG value.

2. ***Inappropriate emissions thresholds***

   The Draft EIS assesses significance by comparing the average annual net emissions with the levels established by inapplicable federal and state regulations and guidance. Specifically, the draft Washington State Clean Air Rule establishes a compliance threshold of 100,000 metric tons of CO_2e per year, the U.S. EPA's Tailoring Rule applies to facility sources that emit more than 75,000 short tons of CO_2e per year, and the Draft CEQ Guidance identifies a threshold of 25,000 metric tons of CO_2e per year. Use of these stated thresholds to determine significance is inappropriate because none were established from a risk or significance basis. Rather, they represent thresholds above which regulatory requirements are activated. In the case of the Draft CEQ guidance, the 25,000 metric tons of CO_2e per year is provided as a reference point "*for purposes of disclosure and not a substitute for an agency's determination of significance under NEPA*".[21] The Draft EIS's statement that the threshold standards provide guidance on assessing significance is incorrect.

3. ***Use of different emissions boundaries and criteria***

   The Draft EIS assessed the net lifecycle emissions associated with the Project against the regulations and guidance described above. Not only are these thresholds inapplicable, they also apply to different

[18] Table 5.6-9, page 5.8-16, Draft EIS.

[19] Section 5.8.1.6, page 5.8-16, Draft EIS.

[20] Section 5.8.1.6, page 5.8-16 to 5.8-17, Draft EIS.

[21] Part III, Section D, page19, CEQ's Revised Draft Guidance on the Consideration of Greenhouse Gas Emissions and the Effect of Climate Change on NEPA Reviews, published in December 2014.

conditions and boundaries. For example, the Draft Washington State Clean Air Rule, which has been withdrawn and now reissued, is intended to apply only to certain sources in Washington State. The Project is not one of these sources. Similarly, the U.S. EPA Tailoring Rule also applies to facility-level emissions rather than lifecycle emissions.

In addition, the boundary conditions also vary. Both regulatory thresholds apply to direct GHG emissions within the facility boundary, whereas the Draft EIS GHG emissions include both direct (within the Project boundary) emissions and indirect emissions from rail and other transportation. This comparison approach is misleading, as it is not using a like-for-like basis.

4. Differing conclusions from other Washington State EISs

Environmental review of other similar projects in Washington State are reaching vastly different climate change conclusions, including project analyses prepared by the same consulting firm, ICF International. For example, both the Tongue River Railroad and Westway Expansion project draft EIS's offer starkly different approaches and conclusions to the GHG and climate change analysis without any evidence as to why.

In the case of Tongue River Railroad project, the determination of significance (using GHG emissions as a representation of risk) compared to the Draft EIS is contradictory when considering the stated order of magnitude of GHG emissions. The Draft EIS concludes that the emissions attributable to the Project are adverse and significant, for approximately 37.6 million metric tons of CO_2e for the 2018-2038 period and an average annual net emissions, when fully operational, of 3.2 million metric tons of CO_2e.[22] Conversely, the Tongue River Draft EIS calculates net GHG emissions to range from a reduction of 1.7 million metric tons of CO_2e to an increase of 81 million metric tons of CO_2e and concludes that "…impacts *from the net annual life-cycle emissions would range from a negligible positive impact to a minor adverse impact.*"[23] The difference in magnitude of GHG emissions between the two projects is starkly different, but accompanied by apparently inverse significance conclusions.

For the Westway Expansion Project (Ecology 2015), a full lifecycle GHG analysis has not been performed because "*Determination of the incremental increases in GHG emissions relative to the no-action alternative is complex and depends on numerous relatively unpredictable factors. The relative contribution of the proposed action to the net change in CO_2 emissions would depend on whether the proposed action results in increased demand for crude oil or displaces other crude oil consumed by end users (which depends, in part, on the source and final destination for the oil), what type of crude oil is being transported (i.e., which emissions factors are used), and what the end use is (e.g., combustion versus development of other products)*." In other words, the complexity and unpredictability of the market forces and lifecycle GHG emissions is used as a reason for not performing a full lifecycle analysis. Performing such an assessment would be too speculative.

[22] Table 5.8-9, page 5.8-16, Draft EIS.

[23] Section 5.2, pages 5.2-2, Tongue River Railroad Draft EIS (STB 2015).

4.3 Absence of Context for Emissions Comparisons

The Draft EIS also provides an "Emissions in Context" section.[24] This notes that the emissions associated with the Project within Cowlitz County in 2028 are comparable to adding 8,100 passenger cars to the road each year and would be less than 0.05% of Washington State's total annual emissions in 2012. Similarly, it also noted that the Project's annual emissions in 2028 in Washington State would be less than 0.4% of the state's total annual emissions in 2012. This approach through comparison is not providing any further context for understanding emissions, and may also be misleading in the absence of further discussion and context in relation to the selected comparison numbers. Some examples include:

- The comparison with number of cars in Cowlitz County is just a different surrogate representation of emissions, but it provides no meaning or understanding in terms of significance. No baseline is provided (such as current car levels in the County) or commentary on what threshold is being adopted as the basis for a significance determination.
- Comparing the emissions as a percentage of state emissions is misleading because the boundary conditions as to how state level emissions are determined will be different compared to the Draft EIS analysis.
- It is erroneous to compare projected 2028 emissions values to 2012 benchmarks, given the significant time difference and the fact that the situation and context for 2028 is not currently known.

In conclusion, the "Emissions in Context" section of the Draft EIS offers no substantive conclusions or additional context as to whether the Project will cause adverse environmental impacts.

5.0 MITIGATION

The Draft EIS describes four measures[25] for MBT-Longview to implement in order to mitigate GHG emissions, including fuel efficiency training, anti-idling policies, electric car usage, and mitigation of 50% of the GHG emissions attributable to the Project.

Mitigation is the avoidance, minimization, rectification, compensation, reduction, or elimination of adverse environmental impacts. The mitigation approach is unsupported and contradicted by the fact that the Draft EIS does not identify any adverse climate change impacts attributable to the Project that would not otherwise occur, as described in Section 3.0. Under SEPA, mitigation must be linked to adverse environmental impacts that would not otherwise occur in the absence of a proposed action and must be roughly proportional in nature and extent to the impacts. The failure to identify adverse environmental impacts attributable to the Project renders these mitigation measures unnecessary and inappropriate.

Additional concerns have been noted in connection with the fourth mitigation measure to mitigate 50% of the emissions attributable to the Project:

[24] Section 5.8.1.6, pages 5.8-18 to 5.8-20, Draft EIS.

[25] Section 5.8.1.8, page 5.8-21, Draft EIS.

- There is no discussion or description of what impact the mitigation would address (e.g. there is no discussion of what adverse environmental impacts in Washington State would be mitigated by reducing emissions, nor what a reduction in emissions would achieve, even assuming that GHG emissions are an appropriate representation of climate change impact).
- The justification appears to be arbitrary. The rationale for using Washington State regulations, namely RCW 80.70 and RCW 80.80, is inappropriate. The Draft EIS actually acknowledges that "*Washington State standards will not apply to these facilities…*"[26] These state regulations are focused on mitigating GHG emissions not from coal terminals but from new thermal power plants (by 20%) and new power generation based on the performance of natural gas-fired plants, respectively. The Draft EIS states that if the coal was used for power plants in the state, then mitigations between 20% and approximately 55% of gross emissions would be required. The rationale for the mitigation measure is therefore based on a twofold transference of responsibility – once from power plants in the state to power plants in other countries, and then from those power plants to the domestic terminal through which some of their coal passed. This is not consistent with the intent of the state regulations; the burden of compliance with a regulation targeting in-state power plants is being applied to a sector of the coal supply chain serving coal to a different country.
- The proposed offset mitigation value for initial operations of 693,723 metric tons of CO2e and for operations at maximum capacity of 1.27 million metric tons CO2e per year is based on net GHG emissions that are significantly overestimated (see Section 4.1).
- The emissions apportioned for mitigation include GHG emissions that occur outside of MBT-Longview's control and far outside of the state.

6.0 CONCLUSION

The Draft EIS has not reliably identified any new climate change effects on Washington State attributable to the Project based on the SEPA framework. Therefore, there is no basis in SEPA for requiring mitigation.

The Draft EIS forms its conclusions principally based on the Project's GHG emissions, which have been used as a representation of climate risk. While it states that the Project's GHG emissions represent a significant impact, the Draft EIS does not explain how these impacts have been determined or establish a causation link between the Project's GHG emissions and the supposed environmental impacts in Washington State that would not otherwise occur under the No Action Alternative. The Draft EIS also avoids any discussion or acknowledgement that it is not possible - with any degree of confidence - to perform project level modeling that reliably attributes potential local or state-level climate change impacts to project-level GHG emissions given the scale, complexity, and uncertainty inherent in current modeling and data analytical techniques.

[26] Section 5.8.1.8, page 5.8-21, Draft EIS.

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Submission Number: ***TRANS-LV-M2-00001***

Received: 5/24/2016 12:00:00 AM
Commenter: Bill Chapman
Organization: Millennium Bulk Terminal-Longview, CEO
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

MR. CHAPMAN: Hello, I'm Bill Chapman, 4029 Industrial Way, Longview. I'm the CEO of Millennium Bulk Terminal-Longview. Two comments about the Draft EIS for this afternoon. But first, I do want to celebrate. And we have been celebrating across the street that the draft is done and out in the open for public comment.

We were grateful, as I said this morning, for the tremendous work done by agency staff and consults as represented by the 4,000 pages and the tremendous depth and technical reports.

We are especially pleased with two significant findings in the draft. Coal dust is not a significant impact and expected to meet all the applicable standards. More broadly and better yet, the EIS finds there are no significant environmental impacts to the natural environment anywhere at the site from operations or construction.

And I want to repeat that for emphasis. Air quality, water quality all good at the site after the study is done. If you care about those things, that's important information. Proponents asked those questions and those questions have now been answered. If the complaint continues about dust, we'll all know it's a device to scare people.

Second, the Draft EIS finds the operations at the site will likely not cause significant impacts to climate. Overall, under most scenarios in metric models in this draft -- I mean, the Tongue River Draft EIS done by the Obama Administration just last year show that the terminal will not significantly change the amount of the greenhouse gas produced globally, and they affirm the analytical foundation for why greenhouse gases would be reduced in the U.S through export.

These environmental findings are important and particularly important is setting the stage for better economic growth, trade, and jobs in Longview and Cowlitz County while assuring Washington's environmental standards are met.

I will come to a close by explaining our purpose statement, Build It Right, on the shirt. It came from a gathering of Millennium employees and management, and it reflects the commitment by our team, all of them, to build this terminal right, high efficiency and low impact.

Thank you.

Submission Number: ***TRANS-PASCO-M1-00082***

Received: 6/2/2016 12:00:00 AM
Commenter: Bill Chapman
Organization: CEO, Millennium Bulk Terminals-Longview
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

MR. CHAPMAN: Good afternoon. I'm Bill Chapman, 4029 Industrial Way, Longview. I'm CEO of Millennium Bulk Terminal-Longview.

Two comments about the Draft EIS. But first, I'm delighted the draft is done and open for public comment. We're grateful for the tremendous work done by agency staff and consultants as represented plainly by the 4,000 pages. We are especially pleased with two significant findings in the draft. Coal dust is not a significant impact and is expected to meet all the applicable standards. And more broadly and better yet, the EIS finds there are no significant environmental impacts to the natural environment anywhere at the site. The area where we applied for permits in the normal scope of an EIS, the news is all good, both in operations and construction. Repeat air quality,water quality, all good. Proponents asked those question and those questions have now been answered. If the complaints continue about dust, we'll know it's just a device to scare people.

Second, the Draft EIS finds the operations at the site will not cause significant impacts to the climate. Overall, under most scenarios in metric models in this draft and in the Tongue River Draft DEIS done by the Obama Administration just last year, show that the terminal will not significantly change the amount of greenhouse gas produced globally and affirms the analytical foundation for why it actually reduces greenhouse gas in the U.S. These environmental findings are particularly important in setting the stage for better economic growth, trade, and jobs in Longview and the rest of the state of Washington while assuring Washington's environmental standards are met.

I will close by explaining our purpose statement on the T-shirt, Build it right. It came from a gathering of Millennium employees and management, and it reflects the commitment by our team, all of them, to build this terminal right with high efficiency, good jobs, low environmental impact and meeting all state standards.

Submission Number: ***TRANS-PASCO-M2-00001***

Received: 6/2/2016 12:00:00 AM
Commenter: Bill Chapman
Organization: Millennium Bulk Terminals, CEO
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Thank you. My name is Bill Chapman, 4029 Industrial Way, Longview. I'm the CEO of Millennium Bulk Terminals.

First, we are just delighted the draft is done and out and open for public comment. We're grateful for the tremendous work done by agencies, staff, and consultants as represented by 4,000 pages.

We are especially pleased, of course, with two significant findings in the draft. Coal dust is not a significant impact and is expected to meet all applicable standards. More broadly and better yet, no significant impact is found in the natural environment anywhere at the site where we applied for permits to build something. From operations or construction, repeat, air quality and water quality all good. Opponents asked the questions and now they have been answered. If complaints continue about dust, we'll know it's just a device.

Second, also significant on the Draft EIS finds that operations at the site will likely not cause significant impacts to climate.

Overall, most scenarios, the models in this draft and in the Tongue River Draft EIS done by the Obama administration just last year showed that the terminal will not significantly change the amount of greenhouses gases produced globally and affirm the analytical foundation why it actually reduces greenhouse gas production in the U.S. to have an export terminal.

These environmental findings are particularly important in setting the stage for better economic growth in trade and jobs in Longview, in the state of Washington, while assuring Washington's high environmental standards are met.

I'll close my comments by explaining our purpose statement, Build it Right. A gathering of Millennium employees and management reflects simply the commitment by our team, all of them, to building the terminal with high efficiency, good jobs, low environmental impacts, and meeting all State standards. Thank you for listening.

Submission Number: ***MBTL-SEPA-DEIS-0000812***

Received: 5/24/2016 1:10:33 AM
Commenter: Anne Miller
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

This is the testimony I had hoped to give at the hearing tomorrow in Longview. I may not be able to attend the hearing so I am submitting my comments in writing. Good afternoon, my name is Anne Miller and I am here as a member of the South Seattle Climate Action Network, as the mother of two daughters and as a person of faith. I am here because I believe that my children have a right to live in a world with clean air, clean water, food that is safe to eat and wilderness left to explore. These rights belong to all children and global warming threatens these basic rights The burning of fossil fuels, and specifically, the consumption of coal, has resulted in climate change which threatens our children's future and which, if unchecked, will strip them of their essential right to a livable planet. I believe that it would be immoral to approve a permit for a project which will have significant, adverse affects on the environment and which will contribute significantly to global warming. It is astounding to me that at this point in history when the science around climate change, the science around the effects of fossil fuel consumption, is so clear and is telling us that we need to radically move away from outdated, inefficient and polluting forms of energy such as the burning of coal, that projects such as the proposed Millenium Coal Terminal are even being considered. As you know, the Draft EIS for the proposed Millennium Coal Terminal, is projected to handle up to 44 million metric tons of coal a year with 24/7 operations for 30 years. The increased rail and barge traffic will have direct and cumulative impacts on safety, traffic, noise, air and water pollution, and economic development in my community and communities along rail lines and the Columbia River. This commission has a duty to protect the health and safety, economic development, and the environment in our communities. The geographic scope of the DEIS is too narrow to provide an accurate assessment of the full range of direct and indirect impacts of this proposal on traffic, public safety, air and water quality, and economic development across the impacted regions where the coal would be extracted, shipped and burned and the DEIS does not adequately address the impact that this project will have on global warming. Finally, and most importantly, this DEIS does not adequately address the impact that this project will have on our children's future. Thank you for the opportunity to testify today.

Submission Number: ***MBTL-SEPA-DEIS-0002065***

Received: 6/7/2016 4:29:13 PM
Commenter: Brandon Miller
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it's the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. The agencies are doing a great job of evaluating Millennium Bulk Terminals port proposal. I am convinced that this project's permit should move forward without further delay.

Submission Number: ***MBTL-SEPA-DEIS-0001297***

Received: 5/26/2016 6:48:41 PM
Commenter: Brett Miller
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

In a time that has included seeing neighbors and friends out of work and under-employed, we need to encourage economic development. In my opinion, that cannot happen soon enough. That is why I am writing today.
Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied â€" get on with it already. I appreciate you considering this feedback.

Miller, Dave (2561)

June 12, 2016

My name is Dave Miller. I live in Camas, Washington, about 1/3 mile from the tracks where the coal trains will pass.

My main concern is with section 4.8 page 26, “Cause Wildlife Strikes along the Rail Corridor in Washington State”.

I have been volunteering for the US Fish & Wildlife Service at the refuges in the gorge since 2006. Several years ago, while working at the Pierce National Wildlife Refuge, I found the carcass of an elk which had been hit by a train. A few months later I found another, so I got permission from the refuge manager to walk the edge of the refuge next to the tracks with a GPS and count the carcasses and bones. In the two miles of track that run through the Pierce refuge, I found the carcasses and remains of 55 animals – mostly elk, but also deer, turkey vultures and other animals. Every time I visit the area near the tracks, there are new carcasses. I suspect that this is happening at every place where the tracks pass through good wildlife habitat, along the entire route from the coal mines to Vancouver.

More trains will mean more wildlife killed by trains, and more wildlife will be blocked from migrating across the tracks like they do currently.

As you know this is not the only coal/oil export proposal. The combination of all the proposed trains will wreak havoc on the wildlife in the gorge that live near the tracks, especially at the Pierce refuge.

I urge you to reject this proposal, but if you do not, I urge you to require the construction of appropriate wildlife overpasses/underpasses at places where large numbers of wildlife are being killed. At the very least you must require the trains to pass very slowly through these areas.

Additional concerns:

1. In section 4.8.7.2 (Other Measures to Be Considered), it states:

   > The co-lead agencies recommend BNSF identify and monitor wildlife-train collision and migration barrier hotspots along the rail corridors to determine whether current and projected levels of rail traffic would result in levels of mortality or migration barrier effects that could measurably affect the status of local wildlife populations. If levels of collision mortality and delays to wildlife movement are determined to have a measurable effect on the status of local wildlife populations, suitable wildlife crossing structures and other measures, such as fencing, should be considered as appropriate. BNSF should consult with WDFW and USFWS in designing approaches to identify and monitor hotspots and in identifying suitable crossing structures and other measures.

   This monitoring needs to be done by someone other than BNSF. It is highly unlikely that BNSF would “identify and monitor wildlife-train collision and migration barrier hotspots”. What motivation would they have to do this? In fact they have every motivation NOT to do this. BNSF does not currently report any of the animals killed by trains on their tracks; I doubt that your “consideration” would make them start doing it. In fact someone has removed the antlers from every dead bull elk I have found along the tracks. I am pretty sure that the BNSF maintenance crews are removing the antlers. Why would a company who seems to think nothing of killing wildlife and (illegally) harvesting parts from the carcasses, all of a sudden become a wildlife advocate and pay to build structures to prevent animals from being killed? This “mitigation” has no teeth and is woefully inadequate.
2. Besides directly killing wildlife, increased fossil fuel train traffic will:
   a. Prevent animals from migrating across and down the tracks like they do currently (there are numerous game trails crossing the tracks). At some point very soon the tracks will become a 1200 mile barrier wall, because there will be a train on them most of the time. Think about the wildlife impacts of that.

b. Make a nearly continuous, deafening roar at the refuges. This will add stress to the wildlife, and disrupt their aural communications.
c. Greatly increase diesel emissions.
d. BNSF is currently spraying herbicide into creeks along the railroad (see photos below). More trains probably means more herbicide along the tracks.
e. Note that the cumulative effects of all these projects multiply the negatives of each project. You need to look at the effects of *all* the projects.

I have several theories why so many animals are being killed by the trains. In all my visits to the Pierce refuge, I have only seen or heard of two animals being killed by cars on Hwy 14, which runs parallel to the tracks, while over 55 animals have been killed by trains. Obviously there is something different going on at the tracks vs. the highway. Here are my theories, based on my observations at Pierce:

- Elk and deer tend to be herding animals. If a herd is near (or on) the tracks when a train approaches, they may run across the tracks to safety. The last few animals may dash in front of the train to avoid becoming separated from the herd.
- Animals use the tracks as a travel path. I have seen evidence of this (animal tracks & trail camera photos). When a train comes, their natural instinct is to outrun it, which they cannot do. The trains are traveling about 50mph through the Pierce refuge.
- There are a lot of trains hauling grain, and a lot of grain is spilled on the tracks (see photos). The grain attracts animals, especially during the winter. The animals are hit and killed by trains. The grain also sprouts and matures, and animals come to eat the tender shoots or grain heads, at all times of the year.
- An animal is killed on the tracks. Scavengers come to feed on the carcass and are also killed. This is probably why I have found dead turkey vultures and coyotes.

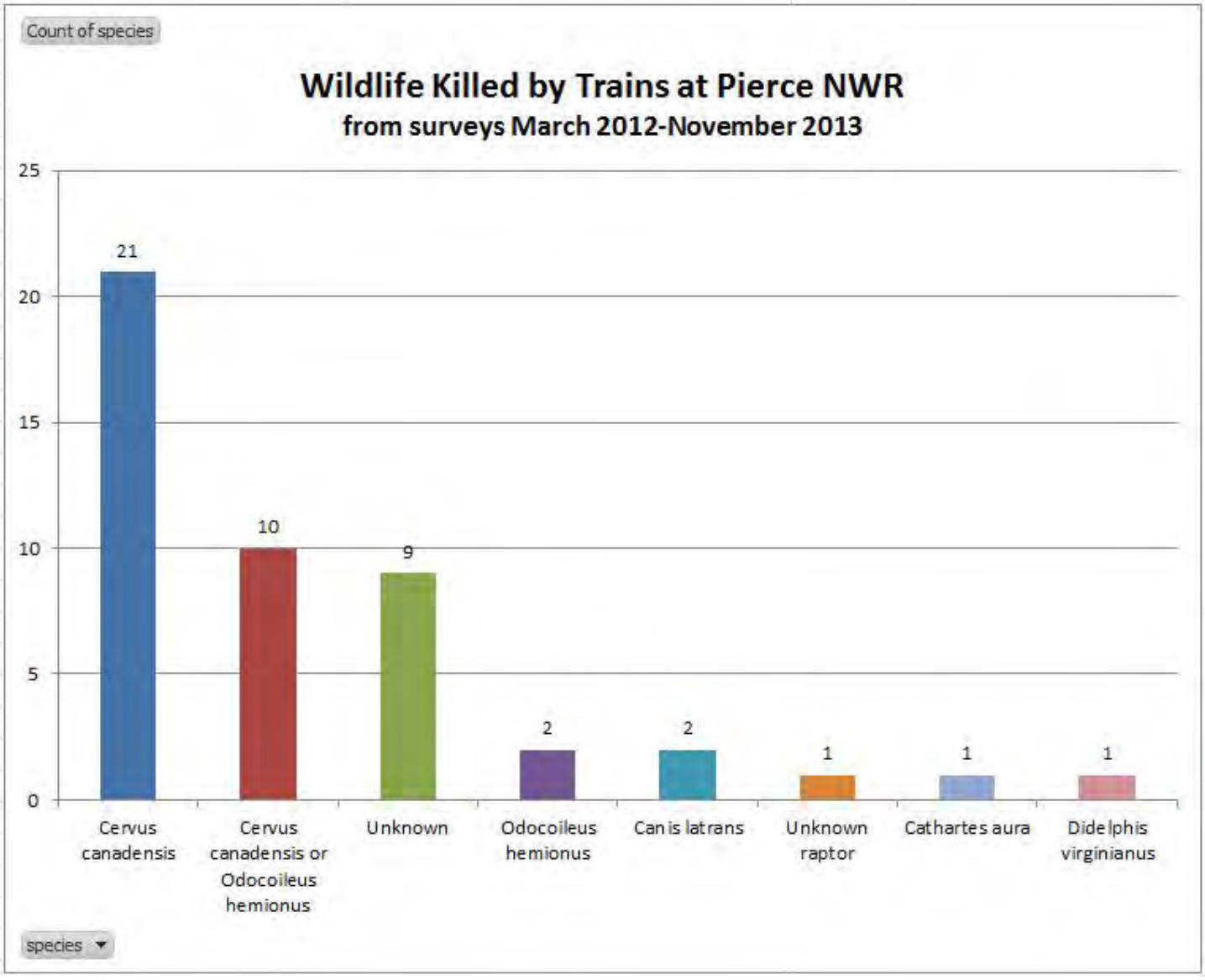
In the pages that follow are photos of a *few* of the animals killed at the Pierce refuge. Many more photos can be found at https://www.flickr.com/photos/refugestewards/albums/72157637777090383
I will also attach a spreadsheet which has GPS waypoints etc. for animal carcasses found up to 11/2/2013. I have found new carcasses since then but haven't had a chance to update the spreadsheet.

Regards,

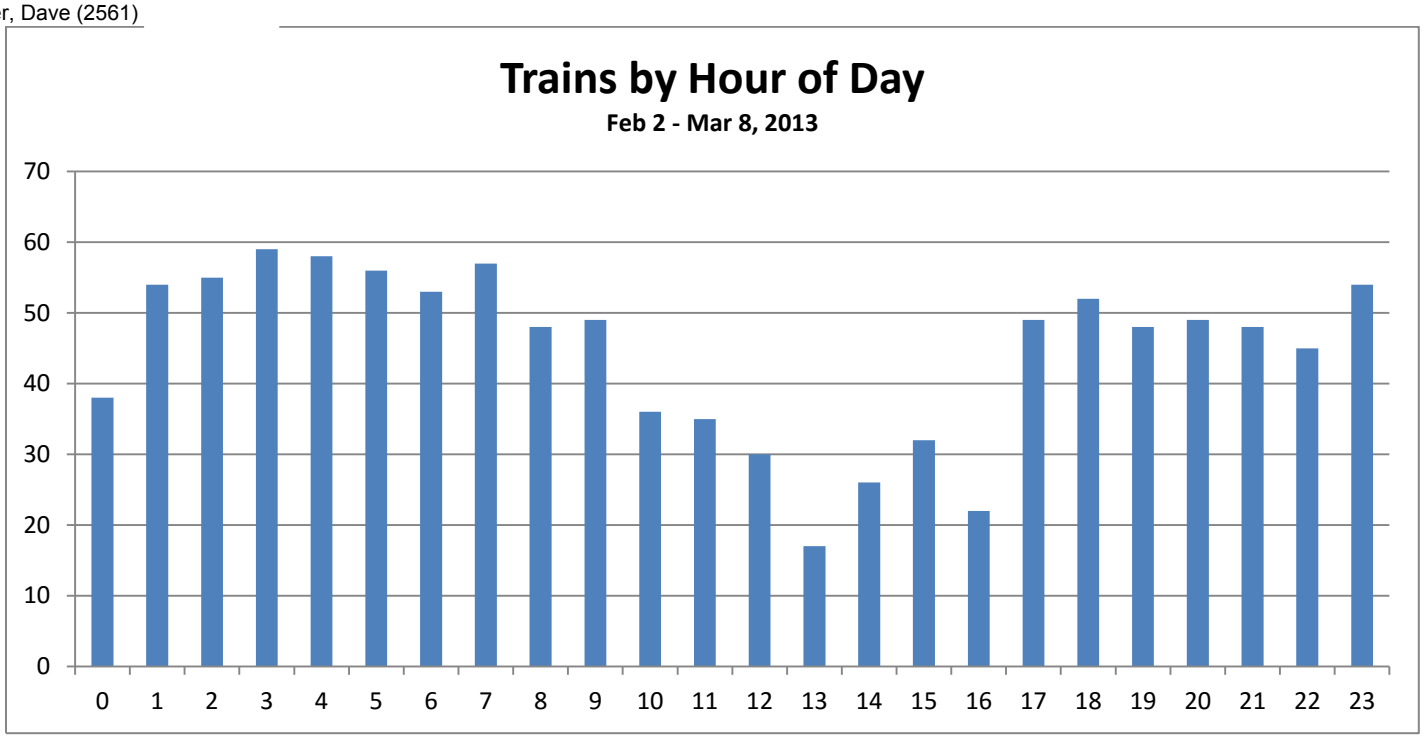
Dave Miller
Camas, WA 98607

Miller, Dave (2561)





Miller, Dave (2561)





Miller, Dave (2561)





Miller, Dave (2561)



Miller, Dave (2561)



Turkey Vulture

Miller, Dave (2561)



Miller, Dave (2561)



Note that its legs are broken. Also notice that someone has cut off the antlers. I am pretty sure that when an elk is killed, the railroad maintenance workers cut off the antlers and take them. Someone has cut off the antlers from every single bull elk/buck deer I have found dead along the tracks.

Miller, Dave (2561)

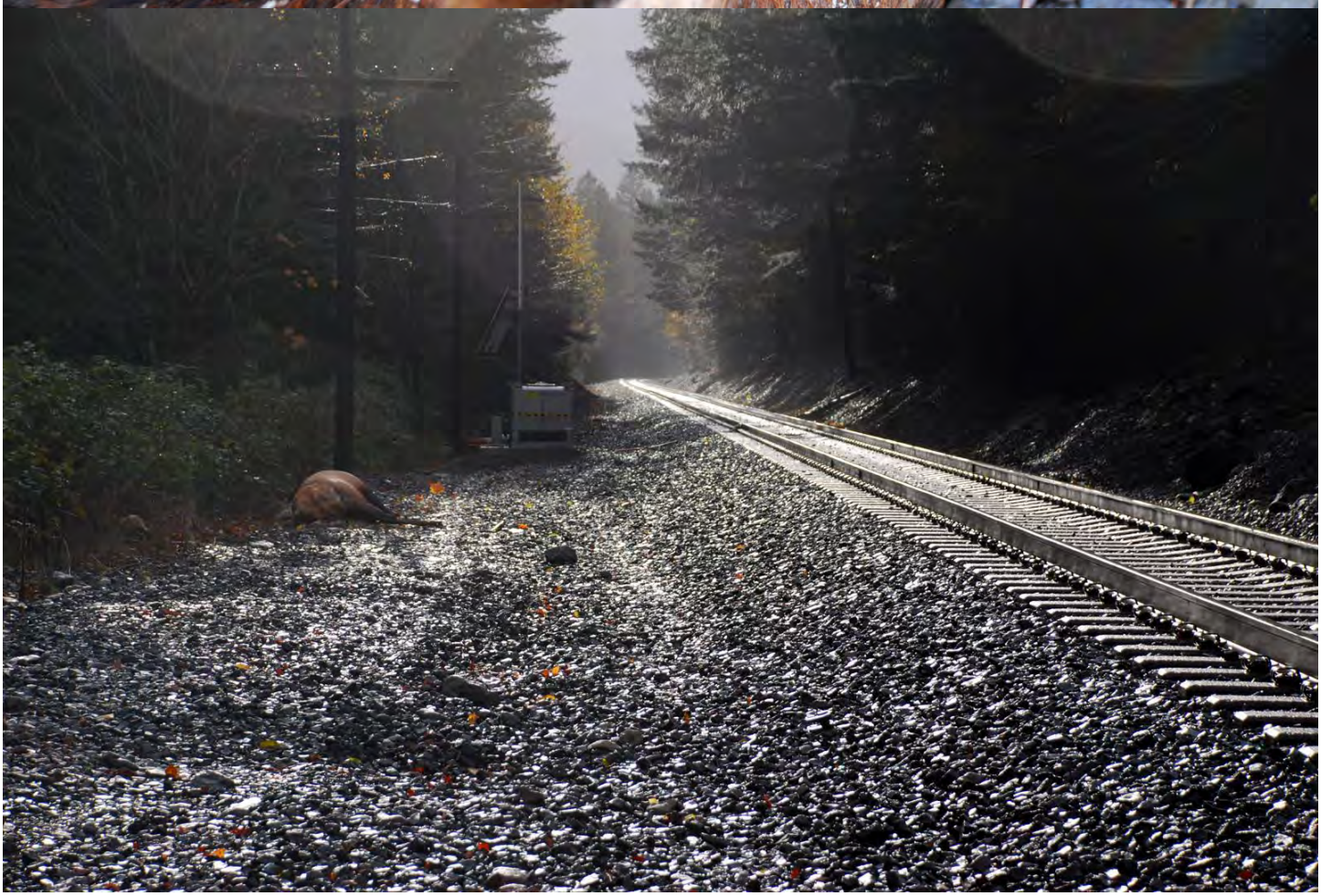


Miller, Dave (2561)



Miller, Dave (2561)





Miller, Dave (2561)



Miller, Dave (2561)



Miller, Dave (2561)



Miller, Dave (2561)



Miller, Dave (2561)



Miller, Dave (2561)



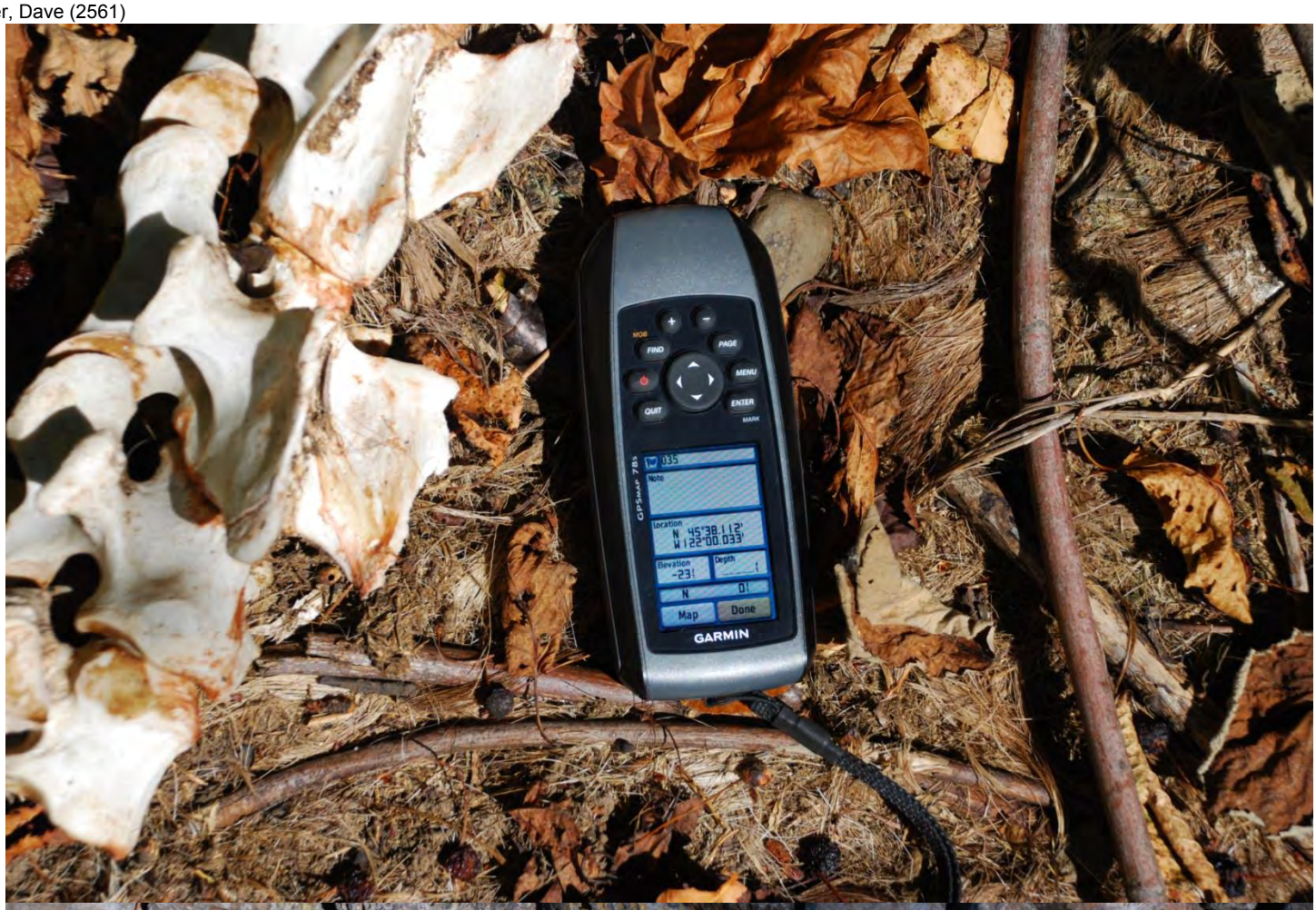
Miller, Dave (2561)



Miller, Dave (2561)



Miller, Dave (2561)





Miller, Dave (2561)



Miller, Dave (2561)



Note that herbicide has been sprayed over the creek.





Dark-eyed juncos eating grain on the tracks.



Panoramic image of the same grain spill.

Miller, Dave (2561)



Miller, Dave (2561)



Miller, Dave (2561)



Miller, Dave (2561)



Miller, Dave (2561)



Miller, Dave (2561)



Submission Number: ***MBTL-SEPA-DEIS-0001776***

Received: 6/2/2016 4:56:52 PM
Commenter: Diane Miller
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Here are my comments on the Millennium coal export terminal. I support the project and the jobs and tax revenues it will provide. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward.

Submission Number: ***MBTL-SEPA-DEIS-0001608***

Received: 5/31/2016 5:44:37 PM
Commenter: Doug Miller
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. Coal exports are a huge opportunity for the Northwest. The infrastructure coal companies are creating will expand trade of all kinds, from apples to software. At a time of increased competition from both West and East Coast ports, Washington needs to seize these opportunities to expand trade and create thousands of family-wage jobs. Thank you for listening.

Submission Number: ***MBTL-SEPA-DEIS-0000140***

Received: 5/9/2016 1:02:41 PM
Commenter: Ed Miller
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Media coverage would have us believe that transporting coal by rail through our state is unprecedented, it's not. We've transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0000295***

Received: 5/10/2016 7:19:18 PM
Commenter: Edward Miller
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our economy and our families are suffering. We can do something about this by supporting the proposed port at Longview that will put people to work quickly and will keep them gainfully employed for years to come. Raising a family is tough, and this economy is not making it any easier. That’s why we need to capitalize on any opportunity that we have to provide good-paying jobs that can support a family. The Millennium Bulk Terminal project will create jobs that can help families give their children the head-start that they need. There are men and women throughout the state that are waiting for the chance to work hard for their families. It simply makes no sense to turn them away at this point. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0001859***

Received: 6/2/2016 6:08:33 PM
Commenter: Edward Miller
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing today to express my support for the Millennium Bulk Terminals project in Longview. I am glad for the opportunity to voice my support of this important project. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage?

Submission Number: ***MBTL-SEPA-DEIS-0001948***

Received: 6/6/2016 2:02:04 PM
Commenter: Edward Miller
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough now it is time to move forward with a fair process for permitting. I'm certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

Miller, Jayme (1698)

Submission Number: ***MBTL-SEPA-DEIS-0001698***

Received: 5/31/2016 7:01:29 PM
Commenter: Jayme Miller
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Allow me to submit my comments regarding Millennium Bulk Terminals proposed port at Longview. I fully support this project. Please commit to a timetable for the issuance of a final EIS. Ecology's SEPA Rules require a final EIS to be issued as close as possible

Submission Number: ***MBTL-SEPA-DEIS-0001736***

Received: 6/1/2016 9:00:28 PM
Commenter: Katherine Miller
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I strongly oppose the proposed coal terminal and trains. This project jeopardizes local air quality, water quality, and public health. Instead of thanking me for my comment, do something that protects our community, instead of corporate profits.

Submission Number: ***MBTL-SEPA-DEIS-0002800***

Received: 6/13/2016 2:29:23 PM
Commenter: Ken Miller
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

We cannot continue one-way international trade that continues to increase our trade deficit with other countries. This bulk commodity export facility will help our producers export products of higher value to other countries which helps producers, helps create port jobs, and helps our balance of trade deficit, which helps supports the purchasing power of our dollar.

Submission Number: ***TRANS-SPOKANE-M1-00004***

Received: 5/26/2016 12:00:00 AM
Commenter: Ken Miller
Organization: Wyoming Infrastructure Authority
State: South Dakota

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. My name is Ken Miller. I'm a member of the board of directors for the Wyoming Infrastructure Authority. I reside in Rapid City, South Dakota.

I'm excited to read the DEIS findings that there are no significant adverse impacts on the natural environment in the Longview project area, and that the impacts to the staged rail system in the year 2028 with the project proposed train traffic is essentially the same as what the 2013 Wash Dot State Rail Plan projects for the year 2025.

I recognize for many oppositions to this project revolves around climate change. I leave the legal aspects and requirements for this facility to mitigate for the end use of this product for others to debate. For our allies in South Korea and Japan who have limited land area, wind and solar power generation will never provide enough electricity for their needs.

I would like to focus on the solutions and technology being the key to addressing CO2 emissions. Worldwide, there are a number of carbon capture and beneficial use initiatives in progress. My written statement refers in some detail to the Integrated Test Center and Dry Fork Power Station in Gillette, Wyoming; the National Carbon Capture Center in Wilsonville, Alabama; the Skymine Project in San Antonio, and the NRG Country Railroad Project at the Parish Power Plant near Houston. I refer to these projects as positive examples for private and public partnerships that are solution seeking.

The Integrated Test Center at the Dry Fork Power Station in Gillette, Wyoming is one example. The state of Wyoming, Tri-State Generation and Transmission Co., and the National Rural Electric Cooperative Association have collaborated on funding this $21 million solution-seeking effort. The X-Prize Foundation will be the first tenant for the Carbon X-Prize -a $10 million award for coal emissions in Wyoming and a $10 million award for natural gas emissions in Canada. For the coal emission effort, over 1,000 expressions of interest have been received- the largest response the X-Prize Foundation has ever obtained. To date, 134 project profiles have been submitted to start the process of winning one of the five test bay slots at the Integrated Test Center. I am not here today soliciting support for this project, but wish to use this as an example for seeking solutions. There are several other opportunities for potential support.
The National Carbon Capture Center in Wilsonville, Alabama is a Department Of Energy sponsored facility that advances both post-combustion and pre-combustion carbon capture and beneficial use technologies. This facility is adjacent to the Gaston Power Station owned and operated by Southern Company. I toured the Carbon Capture Center last year and they were seeking partners to advance their work.
Another example of a solution-seeking project is named Skyonic, which is a Department of Energy supported project in San Antonio, Texas. Their first commercial technology project went on-line last September. It takes 75,000 tons of C02 from a coal fired cement plant and converts that into sodium bicarbonate, hydrochloric acid and bleach. They have two more technologies that have been in development for 10 years that will make similar commercial & industrial products from C02. My final example is the NRG Petro Nova project at the W.A. Parrish power station near Houston, Texas. This project will capture 90% of the C02 from 250 MW of power plant emissions. The captured C02 will be used for enhanced oil recovery in the West Ranch Oil Field, which has been producing oil since 1938. The carbon capture owners in this venture are NRG and JX Nippon O&G Exploration. The Department of Energy also participated in this project with $167 million of cost sharing support.
In conclusion I give these projects as positive examples for private and public partnerships that are solution-seeking. With regard to GHG mitigation costs to the project, I suggest that so many projects have used the human mind to

provide solutions to our energy challenges. There's a far better approach than punitive requirements. As I said earlier, technology solutions are needed to solve problems with CO2 emissions.

Further, more than enough study has been done on this environmental review and a Final EIS should be issued in a timely manner. Thank you.

Respectfully submitted,

Kenneth Miller, PEng
Member, Board of Directors
Wyoming Infrastructure Authority

Office Address:
325 W 18th Street, Suite 1
Cheyenne, WY 82001

Home Address:
6600 Maidstone Court
Rapid City, SD 57702

Submission Number: ***MBTL-SEPA-DEIS-0001975***

Received: 6/6/2016 2:23:10 PM
Commenter: Max Miller
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Despite all the rhetoric to the contrary about coal exports, I firmly believe you can have both good family-wage jobs and be good stewards of the environment. It doesn't have to be a choice of one over the other. I support Millennium Bulk Terminals site in Cowlitz County. These trains are no different than the coal cars we've transported through our state for many decades. In reality, not one ton more of coal will be used globally because of U.S. exports, and the net gain in greenhouse gas emissions is insignificant. If we don't build these terminals, energy suppliers will just look elsewhere for their supply! Thank you for accepting comments for this important proposal. The Millennium project will do a great deal for the economic outlook of this country. Let's get Americans back to work!

Submission Number: ***MBTL-SEPA-DEIS-0002819***

Received: 6/13/2016 2:37:06 PM
Commenter: Perry Miller
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Ramping up exports is key to Washington State economy and I am all for jobs.

Saftey is a big concern for me. 2 years ago I had an opportunity to research the coal Industry in Wyoming.

I toured, Dry Fork Plant a new coal base electric generation power plant, near Gillette Wyoming.

Before my visit, I actually thought those plants would be a lot dirtier, more dangerous, and many more regulation should be applied to coal plants, but what I saw was a State of the art facilities. What I saw was a very clean environment (spotless of coal dust). The Trains treated with a coated a sealant to create a crust on the coal to prevent dust from escaping.

Later I toured Cordero Rojo mine, a open pit Mine in Campbell County, near the city of Gillette. Once again trucks very clean- and as I stood in the pit and I did not see or smell any coal dust and there was moniters detecting if any dust particles or contaminants were in the air. And, there was water trucks keeping the ground stable as coal was being extracted below the top soil, then the soil covered back up.

There is an increase global demand especially in Asia and if our state does not support the expansion of export terminals in Washington, low sulfur coal Wyoming will head to Canada and our neighboring Country will take advantage of those exports.

Through mitigation, Millennium Bulk Terminals will have the state of art technology that the powered river basin in Montana and Wyoming had, and the rails will transport coal from mines to export terminals safely. I am support of Millennium Bulk terminals and the jobs it provides for Washington State.

Rick Miller
chair Franklin Co Commission
509 492 6857

Miller, Suzette (2236)

Submission Number: ***MBTL-SEPA-DEIS-0002236***

Received: 6/8/2016 1:25:46 PM
Commenter: Suzette Miller
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I strongly support the Millennium Bulk Terminals - Longview

Submission Number: ***MBTL-SEPA-DEIS-0000277***

Received: 5/10/2016 6:40:16 PM
Commenter: Kimberly Mills
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our economy and our families are suffering. We can do something about this by supporting the proposed port at Longview that will put people to work quickly and will keep them gainfully employed for years to come. Media coverage would have us believe that transporting coal by rail through our state is unprecedented, it's not. We've transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality.

MILNE, DAVID (0329)

Submission Number: ***MBTL-SEPA-DEIS-0000329***

Received: 5/11/2016 2:33:23 AM
Commenter: DAVID MILNE
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I want to voice my support for the proposed Millennium Bulk export facility in Longview. I want to commend you for such an in-depth environmental review. With this exhaustive review, I am confident that the project will meet Washington's already high environmental standards. However, we must also keep in mind our economy and the livelihoods of our citizens. The Millennium terminal will positively impact Washington for years to come. Additionally, the tax revenues from the project will support projects and services for the state's citizens. The project also offers an opportunity to expand our ports, ensure that jobs are created and [reserved, stimulate growth in the local and regional economy. Thank you for considering my comment.

MILNE, NICOLE (0340)

Submission Number: ***MBTL-SEPA-DEIS-0000340***

Received: 5/11/2016 2:58:53 AM
Commenter: NICOLE MILNE
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I want to voice my support for the proposed Millennium Bulk export facility in Longview. I want to commend you for such an in-depth environmental review. With this exhaustive review, I am confident that the project will meet Washington's already high environmental standards. However, we must also keep in mind our economy and the livelihoods of our citizens. The Millennium terminal will positively impact Washington for years to come. Additionally, the tax revenues from the project will support projects and services for the state's citizens. The project also offers an opportunity to expand our ports, ensure that jobs are created and [reserved, stimulate growth in the local and regional economy. Thank you for considering my comment.

Submission Number: ***MBTL-SEPA-DEIS-0000482***

Received: 5/18/2016 10:55:26 AM
Commenter: Asteroid Miner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments
Submission Text

Coal must be left in the ground. Global Warming [GW] is already disrupting agriculture, including here in the corn belt of the USA. We here in Iowa and Illinois already had doses of "wetter." It was bad every time. Both planting and harvesting have become problematical because of the extra rain. Some fields are too muddy for a tractor or a combine to navigate. 2008: Seedlings washed away twice so fields have to be planted 3 times to get 1 crop in Mercer County. 2013: Illinois between Moline and Chicago has had way too much rain this year. Fields went unplanted & unplowed into May because of standing water. Recall that in 2012 there was drought in spring and summer, then at harvest time the fields were too wet to drive a combine on. Farmers waited until the ground was frozen before harvesting. The corn, what there was, was damaged by having been frozen. In Missouri, there was no corn grain harvested, at least in some places. In Iowa and Illinois, some corn was harvested. In Minnesota, a full crop was harvested.? Farming cannot just move North. The soil isn't right further north. We don't want wetter. We don't want dryer. We already have 1.5 degrees Fahrenheit of warming and our food supply is threatened. See the book: "Six Degrees" by Mark Lynas. 'The following is an article by Mark Lynas based on his book Six Degrees: Our Future on a Hotter Planet. It was published in the Guardian on 23 April 2007. "1ºC [1.8 degrees F] Nebraska isn’t at the top of most tourists’ to-do lists. However, this dreary expanse of impossibly flat plains sits in the middle of one of the most productive agricultural systems on Earth. Beef and corn dominate the economy, and the Sand Hills region – where low, grassy hillocks rise up from the flatlands – has some of the best cattle ranching in the whole US. But scratch beneath the grass and you will find, as the name suggests, not soil but sand. These innocuous-looking hills were once desert, part of an immense system of sand dunes that spread across the Great Plains from Texas in the south to the Canadian prairies in the north. Six thousand years ago, when temperatures were about 1C warmer than today in the US, these deserts may have looked much as the Sahara does today. As global warming bites, the western US could once again be plagued by perennial drought – devastating agriculture and driving out human inhabitants on a scale far larger than the 1930s “Dustbowl” exodus." Some time between 2022 and 2040, you will go to the grocery store and find no food. We are headed for a human population crash from 7.5 Billion to 70 thousand or zero people some time between 2022 and 2040. We don't have time for research or fooling around with renewables. Causes of a population crash: Global Warming [GW] will cause civilization to collapse within 13 years give or take 6 years because GW will cause the rain to move and the rain move will force agriculture to collapse. Famine has been the cause of many dozens of previous population crashes. The cause of the collapse is the burning of coal. Coal must be left in the ground everywhere on this planet. Exporting coal is suicidal and genocidal. The coal terminal must not be built. The coal industry is already guilty of genocide. Coal CO2 is already killing people in Syria, South Sudan, India, China, the US, Canada and everywhere. GW had something to do with making forest fires bigger and hotter, and hurricanes bigger.

If we don't act immediately and take draconian action, we humans could be extinct by 2060. This is not a joke.

Please read: "Drought Under Global Warming: a Review" by Aiguo Dai
http://www.atmos.albany.edu/facstaff/adai/
This was made with data on the extent of deserts from 1870 to present. The usual General Circulation [computer] Models [GCMs] were not used. Since the sensitivity was not used, the sensitivity is irrelevant. Civilization collapses in the near future. See the maps of drought in the 2060s on page 15.

"Preliminary Analysis of a Global Drought Time Series" by Barton Paul Levenson, not yet published. Under BAU [Business As Usual], agriculture and civilization will collapse soon but the date is unspecified, due to drought/desertification caused by GW [Global Warming].

Reference: "The Long Summer" by Brian Fagan and "Collapse" by Jared Diamond. When agriculture collapses, civilization collapses. Fagan and Diamond told the stories of something like 2 dozen previous very small civilizations. Most of the collapses were caused by fraction of a degree climate changes. In some cases, all of that group died. On the average, 1 out of 10,000 survived. We humans could go EXTINCT in the 2050s. The 1 out of 10,000 survived because he wandered in the direction of food. If the collapse is global, there is no right direction.

Reference: "Overshoot" by William Catton, 1980. We humans are about to experience a population crash, from 7 or 8 Billion people to maybe seventy thousand or zero [extinction]. There are several reasons, such as there are too many people [crowding, etc.], global

warming will cause agriculture to collapse, magical thinking, etcetera.

We must take extreme action now. Cut CO2 production 40% by the end of 2019 worldwide. [How to do this: Ban the mining of coal.] Continuing to make CO2 is the greatest imaginable GENOCIDE. We have to act NOW. Acting in 2049 will not work. Nature just doesn't work that way. All fossil fuel fired power plants must be shut down and replaced with nuclear worldwide. With factory built nuclear power plants, we can still get it done by the end of 2019.

Advanced Review

Drought under global warming: a review

Aiguo Dai*

This article reviews recent literature on drought of the last millennium, followed by an update on global aridity changes from 1950 to 2008. Projected future aridity is presented based on recent studies and our analysis of model simulations. Dry periods lasting for years to decades have occurred many times during the last millennium over, for example, North America, West Africa, and East Asia. These droughts were likely triggered by anomalous tropical sea surface temperatures (SSTs), with La Niña-like SST anomalies leading to drought in North America, and El-Niño-like SSTs causing drought in East China. Over Africa, the southward shift of the warmest SSTs in the Atlantic and warming in the Indian Ocean are responsible for the recent Sahel droughts. Local feedbacks may enhance and prolong drought. Global aridity has increased substantially since the 1970s due to recent drying over Africa, southern Europe, East and South Asia, and eastern Australia. Although El Niño-Southern Oscillation (ENSO), tropical Atlantic SSTs, and Asian monsoons have played a large role in the recent drying, recent warming has increased atmospheric moisture demand and likely altered atmospheric circulation patterns, both contributing to the drying. Climate models project increased aridity in the 21st century over most of Africa, southern Europe and the Middle East, most of the Americas, Australia, and Southeast Asia. Regions like the United States have avoided prolonged droughts during the last 50 years due to natural climate variations, but might see persistent droughts in the next 20–50 years. Future efforts to predict drought will depend on models' ability to predict tropical SSTs. © 2010 John Wiley & Sons, Ltd. *WIREs Clim Change* 2011 2 45–65 DOI: 10.1002/wcc.81

WHAT IS DROUGHT?

Drought is a recurring extreme climate event over land characterized by below-normal precipitation over a period of months to years. Drought is a temporary dry period, in contrast to the permanent aridity in arid areas. Drought occurs over most parts of the world, even in wet and humid regions. This is because drought is defined as a dry spell relative to its *local* normal condition. On the other hand, arid areas are prone to drought because their rainfall amount critically depends on a few rainfall events.[1]

Drought is often classified into three types[2,3]: (1) *Meteorological drought* is a period of months to years with below-normal precipitation. It is often accompanied with above-normal temperatures, and precedes and causes other types of droughts. Meteorological drought is caused by persistent anomalies (e.g., high pressure) in large-scale atmospheric circulation patterns, which are often triggered by anomalous tropical sea surface temperatures (SSTs) or other remote conditions.[4–6] Local feedbacks such as reduced evaporation and humidity associated with dry soils and high temperatures often enhance the atmospheric anomalies.[7] (2) *Agricultural drought* is a period with dry soils that results from below-average precipitation, intense but less frequent rain events, or above-normal evaporation, all of which lead to reduced crop production and plant growth. (3) *Hydrological drought* occurs when river streamflow and water storages in aquifers, lakes, or reservoirs fall below long-term mean levels. Hydrological drought develops more slowly because it involves stored water that is depleted but not replenished. A lack of precipitation often triggers agricultural and hydrological droughts, but other factors, including more intense but less frequent precipitation, poor water management, and erosion, can

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also cause or enhance these droughts. For example, overgrazing led to elevated erosion and dust storms that amplified the Dust Bowl drought of the 1930s over the Great Plains in North America.[8]

Few extreme events are as economically and ecologically disruptive as drought, which affects millions of people in the world each year.[3] Severe drought conditions can profoundly impact agriculture, water resources, tourism, ecosystems, and basic human welfare. Over the United States, drought causes \$6–8 billion per year in damages on average, but as much as \$40 billion in 1988.[9] Drought-related disasters in the 1980s killed over half a million people in Africa.[10] The effect of drought varies with coping capabilities. For example, people living in regions with advanced irrigation systems, such as those in developed countries, can mitigate the impacts of drought much better than farmers in Africa and other developing countries who often have limited tools to combat droughts and other natural disasters. As global warming continues, the limited capabilities in developing countries will become an increasingly important issue in global efforts to mitigate the negative impact of climate change.

HOW DO WE QUANTIFY DROUGHT?

In this section, I describe the indices commonly used to monitor and quantify drought. Drought is characterized by three main aspects[2]: intensity, duration, and spatial coverage. Intensity is the degree of the precipitation, soil moisture, or water storage deficit; it may include consideration of the severity of the associated impacts. Drought typically lasts for several months to a few years, but extreme drought can persist for several years, or even decades for so-called mega-drought.[11] The latter is linked to SST decadal variations in the low-latitude Pacific and Indian Oceans[12,13] and the North Atlantic Ocean.[14–16] Severe, prolonged droughts may be punctuated by short-term wet spells. Mild droughts may occur over a small region (e.g., a few counties), but severe ones can cover most of a continent, such as the Dust Bowl drought in the 1930s over North America.[5,8]

In modeling studies,[4–6] simple precipitation anomalies, preferably normalized by standard deviation (SD) over regions with large gradients, are often used to represent dry and wet conditions. Although precipitation is often the dominant factor determining the aridity of a region, local droughts and wet spells are determined by the cumulative effect of the imbalance between atmospheric water supply (i.e., precipitation or P) and demand (i.e., potential evapotranspiration or PE). The former (P) is controlled largely by atmospheric processes, whereas the latter (PE) is determined by near-surface net radiation, wind speed, and humidity.[17]

To better monitor and quantify drought, various drought indices have been developed.[10,18–21] Table 1 compares the most commonly used drought indices. A drought index usually measures the departure from the local normal condition in a moisture variable based on its historical distribution. For meteorological drought, precipitation is the primary variable in computing the indices, with secondary contributions from surface air temperature to account for the effect of evaporation in some of the indices, such as the Palmer Drought Severity Index (PDSI). For agricultural drought, soil moisture content (not always measured) is often used, whereas streamflow is commonly used in measuring hydrological drought. Keyantash and Dracup[20] evaluated the performance of a number of commonly used drought indices based on data from two local climate zones in Oregon, USA, and suggested that the rainfall deciles (RD), computed soil moisture (CSM), and total water deficit are the top performing indices for meteorological, agricultural, and hydrological drought, respectively.

The PDSI is the most prominent index of meteorological drought used in the United States.[19] It also has been used to quantify long-term changes in aridity over global land in the 20th[35,36] and 21st[37,38] century, and in tree-ring based reconstructions of drought.[39,40] The PDSI was created by Palmer[22] with the intent to measure the cumulative departure in surface water balance. It incorporates antecedent and current moisture supply (precipitation) and demand (PE) into a hydrological accounting system. Although the PDSI is a standardized measure, ranging from about −10 (dry) to +10 (wet), of the surface moisture condition that allows comparisons across space and time, the normal climate conditions tend to yield more severe PDSI in the Great Plains than other US regions.[41] To improve the spatial comparability, one may re-normalize local PDSI to have a standard deviation (SD) similar to that in the central United States, where the Palmer model was calibrated,[22] or use the self-calibrated PDSI,[42] which re-calibrates to local conditions and appears to be a superior drought index.[43,44] The PDSI is also imprecise in its treatment of all precipitation as immediately available rainfall (i.e., no delayed runoff from melting snow), its lack of impact of vegetation or frozen soils on evaporation, the non-locally calibrated coefficients,[24] and some other processes.[23] For example, Hobbins et al.[45] found that the PE estimate using the Thornthwaite equation[46] in the original Palmer model could lead to errors in energy-limited regions, as

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TABLE 1 | Comparison of Commonly-used Drought Indices (see Refs 20, 21 for more details)

Type	Index Name	Calculation	Drought Classification	Strength	Weakness	References and Applied Area
Meteorological drought	Palmer Drought Severity Index (PDSI)	Based on a 2-layer bucket-type water balance model, the PDSI measures the departure of moisture balance from a normal condition	−4.0 or less: extreme drought; −3.0 to −3.99: severe drought; −2.0 to −2.99: moderate drought; −1.0 to −1.99: mild drought; −0.5 to −0.99: incipient dry spell; 0.49 to −0.49: near normal	Considers both water supply (precipitation) and demand (potential evapotranspiration)	Does not work well over mountainous and snow covered areas; may require re-normalization	Refs 22–24; mostly the United States, but also globe
	Standardized Precipitation Index (SPI)	Fitting and transforming a long-term precipitation record into a normal distribution with respect to the SPI, which has zero mean and unit SD.	−2 or less: extremely dry; −1.5 to −1.99: severely dry; −1.0 to −1.49: moderately dry; −0.99 to 0.99: near normal	Can be computed for different time scales; symmetric for both dry and wet spells; relates to probability	Requires long-term precipitation data; no consideration of evaporation	Refs 25, 26; any area by drought planners
	Rainfall Deciles (RD)	Ranking rainfall in the past 3 months against the climatological record of 3-month rainfall, which is divided into 10 quantiles or deciles	deciles 1–2 (lowest 20%): much below normal; deciles 3–4: below normal; deciles 5–6: near normal	Provides a statistical measure of precipitation; performed well in limited tests	Requires long-term precipitation data; no consideration of evaporation	Ref 27; Australia
Agricultural Drought	Computed Soil Moisture (CSM)	Soil moisture content is computed by a land surface model forced with observed precipitation, temperature and other atmospheric forcing	Drought may be defined based on the percentiles of the CSM, e.g., $\leq$20th percentile: very dry; 20–40%: dry; 40–60%: near normal	Considers antecedent conditions	Requires atmospheric forcing data and a land surface model	Refs 28–30; the United States, globe
	Palmer Moisture Anomaly Index (*Z*-index)	The *Z*-index is the moisture anomaly for the current month in the Palmer model	Percentiles of the *Z*-index may be used to define drought	Rapid response to current precipitation deficit	Does not consider antecedent conditions	Refs 22, 24; the United States
Hydrological Drought	Total water deficit (*S*)	$S = D \times M$, where *D* is the duration during which the streamflow is below the normal level and *M* is the average departure of streamflow from the long-term mean during period *D*	*S* may need normalization in defining drought	Simple calculation	No sub-basin information, no standard drought classification	Ref 31; the United States
	Palmer Hydrological Drought Index (PHDI)	Computed using the same Palmer model as for the PDSI, but with a more stringent criterion for the termination of the drought or wet spell	Values similar to PDSI, but with smoother variations	Use of a water balance model to account for the effect of both precipitation and temperature	Does not work well over mountainous and snow covered areas; may require re-normalization	Ref 22; mostly the United States
	Surface Water Supply Index (SWSI)	Calculated by river basin based on snowpack, streamflow, precipitation, and reservoir storage	Normalized values similar to PDSI	Considers snowpack and water storage	Basin-dependent formulations	Refs 32, 33; the western United States
Regional Drought	Drought Area Index (DAI)	Percentage of a given region under drought condition based on a drought intensity index	Drought is defined based on a separate index	Quantifies drought areal extent	Does not provide the mean intensity of drought over the region	Ref 34; anywhere
	Drought Severity Index (DSI)	Area-weighted mean of a drought intensity index over the drought area in a given region	Drought is defined based on a separate index	Quantifies drought severity over a region	Does not provide drought areal extent	Ref 35; anywhere

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the Thornthwaite PE is based only on temperature and latitude. This error can be minimized, however, by using the Penman-Monteith (PM) equation,[37] which accounts for the effects of radiation, humidity, and wind speed and works best over Australia in a comparison of various PE formulations by Donohue et al.[47]

Despite these caveats, PDSI values are significantly correlated with measured soil moisture content in the warm season and streamflow over many regions over the world,[36] and thus can be used as a drought index over the low and middle latitudes. Furthermore, the PDSI uses both precipitation and surface air temperature as input, in contrast to many other drought indices that are based on precipitation alone[20] (Table 1). This allows the PDSI to account for the basic effect of surface warming, such as that occurred during the 20th century[36] and may occur in the 21st century,[38] on droughts and wet spells. The effect of surface temperature, which accounts for 10–30% of PDSI's variance, comes through PE. As precipitation and surface air temperature are the only two climate variables with long historical records, the PDSI makes full use of these data and can be readily calculated for the last hundred years or so for most land areas.[36]

For model-projected 21st century climate with large warming, drought indices that consider precipitation only and do not account for changes in atmospheric demand for moisture due to increased radiative heating and surface warming may not work well. Even for the indices that consider the whole surface water budget, such as the PDSI, the interpretation of their values for the future climate may need to be revised. This is because all the drought indices have been defined and calibrated for the current climate. But with the large warming trend in the 21st century, the future PDSI is greatly out of the range for the current climate (cf. section on *How Will Droughts Change in Coming Decades?*).

HOW ARE DROUGHTS CHANGING AROUND THE WORLD?

In this section, I first provide a historical perspective by examining how drought has varied over many regions of the world during the last millennium, and then present aridity changes since 1950, when instrumental records are relatively abundant and rapid warming has occurred, especially since the late 1970s. I then discuss the causes of the recent aridity changes, especially their relationship with greenhouse gas (GHG) induced global warming.

Long-term Historical Perspective

Drought is a normal part of climate variations. Tree-ring and other proxy data, together with instrumental records, have revealed that large-scale droughts have occurred many times during the past 1000 years over many parts of the world, including North America,[40,48–50] Mexico,[16,51] Asia,[52–64] Africa,[65,66] and Australia.[67,68] For example, successive "megadroughts", unprecedented in persistence (20–40 year) yet similar in severity and spatial distribution to the major droughts experienced in modern-day's North America, occurred during a 400-year-long period in the early to middle part of the second millennium AD over western North America (Figure 1; Ref 49). Compared with these multi-decadal droughts, the modern-day droughts in the 1930s and 1950s had similar intensity but shorter durations. It is suggested[13,49] that these medieval megadroughts were

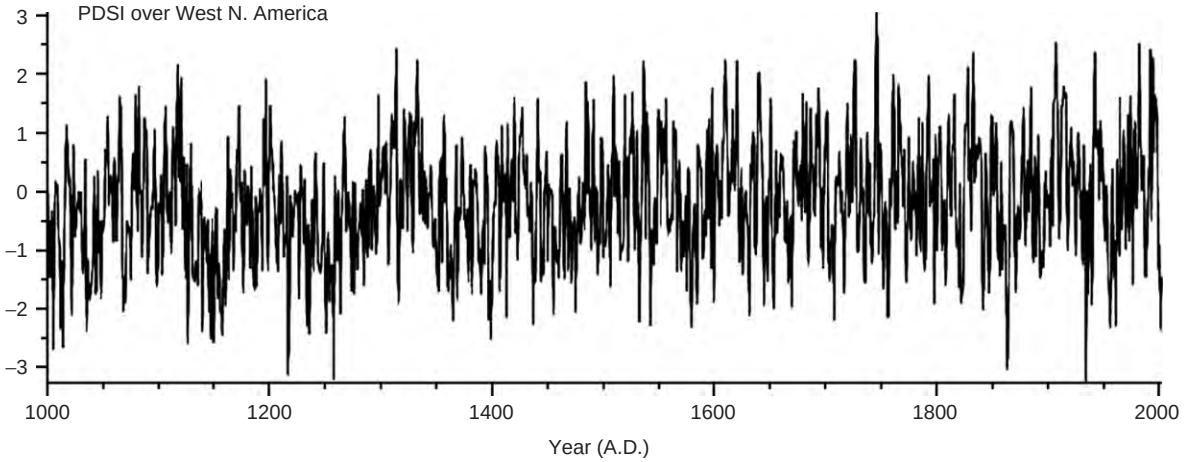


FIGURE 1 | Time series of the tree-ring reconstructed PDSI (<−1 for drought) averaged over western North America (25°–50°N, 95°–125°W) from 1000 to 2003 AD (Reprinted with permission from Ref 49.)

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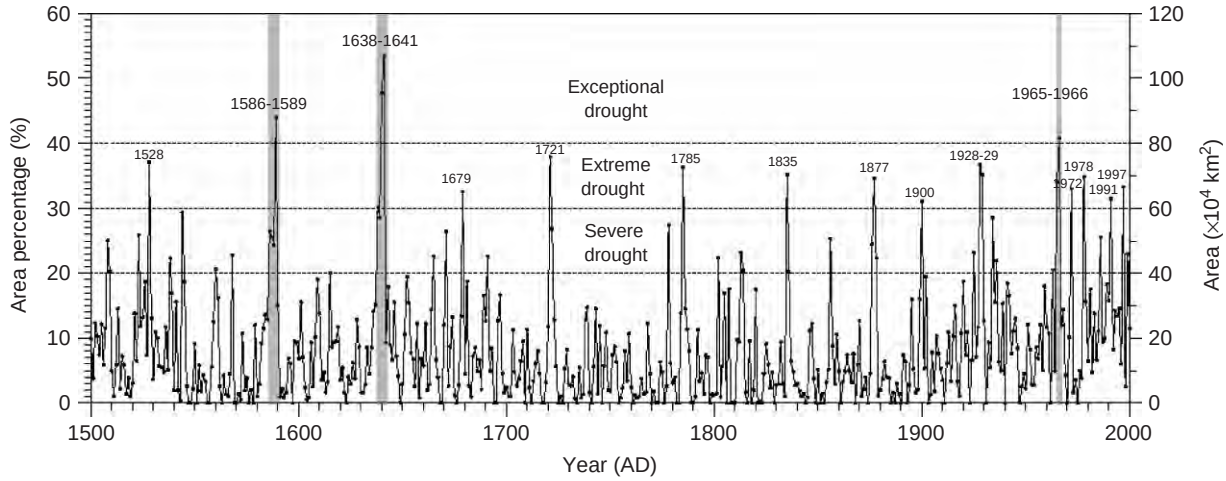


FIGURE 2 | Time series of percentage area (left ordinate) and actual area (right ordinate) over eastern China (22°–40°N, 105°–122°E) in very dry conditions (severe drought or worse) during the last five centuries, created using GIS technique based on the network of the drought/flood index in China of Zhang et al.[55] Severe, extreme, and exceptional drought years stand out, with area percentages reaching 20, 30 and 40%, respectively. (Reprinted with permission from Ref 74. Copyright 2007 Springer.)

likely triggered by multi-decadal La Niña-like SST patterns in the tropical Pacific Ocean, as is the case for the 19th and 20th centuries,[69–72] including the Dust Bowl drought of the 1930s[5] when elevated dust loading may also have enhanced the drought.[8] The La Niña-like SST patterns in the tropical Pacific may also cause drought conditions in other parts of the extra-tropics.[72,73] Other studies[14,16] also suggest a significant role of the Atlantic multi-decadal Oscillation (AMO) in causing prolonged droughts over the United States and Mexico, although the AMO's role is found to through its modulation of El Niño-Southern Oscillation's (ENSO) influence in model simulations.[15]

Over East China, historical records revealed that large-scale droughts occurred many times during the last 500 years, with more widespread droughts during 1500–1730 and 1900 to present and fewer ones from 1730 to 1900[74] (Figure 2). The severe droughts in East China, such as those occurred in 1586–1589, 1638–1641, and 1965–1966, usually develop first in North China (34°–40°N), and then either expand southward or move to the Yangtze River Valley (27°–34°N) and the northern part of the southeastern coastal area (22°–27°N).[74,75] Similar southward migration (at ~3° latitude/decade) of multi-year dry and wet anomalies was also found in the western United States where the anomalies first developed in the higher latitudes of the western United States[75] A weakened summer monsoon and an anomalous west- and north-ward displacement of the western Pacific Subtropical High are linked to severe droughts in East China.[74,76] It is also suggested that large volcanic eruptions might be a trigger for severe droughts in East China,[74] and El Niño-like warming in the tropical Pacific could lead to weakened summer monsoons and thus drier conditions in East China.[77] Although Zhang et al.[59] did not find a consistent association between aridity and temperature anomalies during the past millennium over the Yangtze Delta region, the apparent trend toward more widespread dry conditions since the early 20th century over entire East China (Figure 2) is of great concern.

West Africa, where the severe and widespread Sahel droughts of the 1970s and 1980s (Figure 3) devastated the local population, has been the subject of a very large number of studies.[78–81] Proxy data for African lake levels (Figure 4) indicate that very dry and wet periods occurred in the early and late part of the 19th century, respectively, over West and East Africa. The recent Sahel drought is not unusual in the context of the past three millennia,[66] which indicates that natural monsoon variations in West Africa are capable of causing severe droughts in the future. Many studies have shown that the recent Sahel droughts resulted primarily from a southward shift of the warmest SSTs and the associated inter-tropical convergence zone (ITCZ) in the tropical Atlantic,[4,82–84] and the steady warming in the Indian Ocean, which enhances subsidence over West Africa through Rossby waves.[85,86] Reduced vegetation cover and surface evaporation may have provided a positive feedback that enhances and prolongs the droughts.[84,87–89]

Global Aridity Changes Since 1950

Instrumental records of precipitation, streamflow, cloudiness, surface radiation, humidity, winds, and

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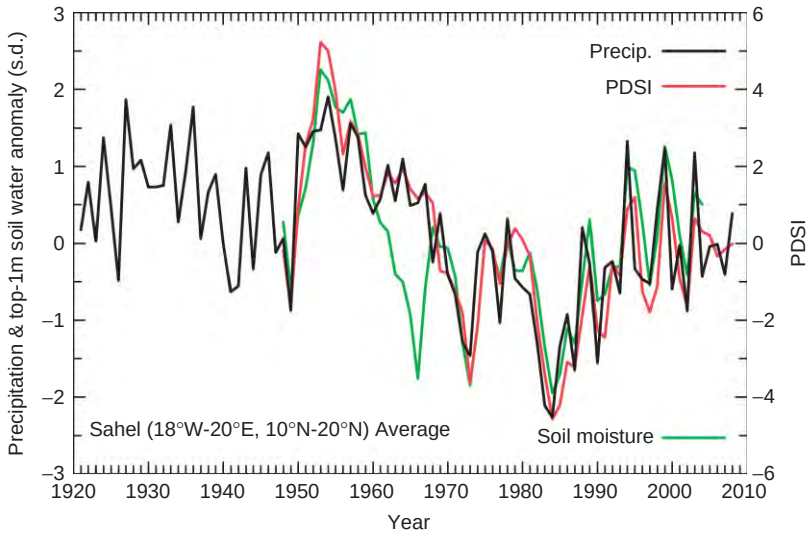


FIGURE 3 | Annual time series averaged over the Sahel (18°W–20°E, 10°N–20°N, land only) for observed precipitation from 1921 to 2008 (black), Palmer Drought Severity Index (PDSI) (red) and CLM3-simulated top-1 m soil moisture content (green). The precipitation and soil moisture are shown as normalized anomalies in units of standard deviation (SD).

other drought-relevant variables are sparse before around 1950 over most of the globe. The period since 1950 also has experienced rapid increases in global surface temperature and atmospheric CO_2 and other GHGs.[90] Thus, aridity changes since 1950 may provide insights on whether drought will become more frequent and widespread under global warming in the coming decades, although natural variations such as those revealed by proxy data (section *Long-term Historical Perspective*) are needed in assessing long-term trends. Many studies have examined recent hydroclimate trends over various regions,[67,91–94] and some studies[30,95] applied land model-simulated soil moisture, forced by observation-based atmospheric forcing, to characterize historical droughts.

In this section, an update and synthesis are given of the global analyses of precipitation,[96–98] PDSI,[35,36] streamflow,[99] and model-simulated soil moisture[29,93] to depict aridity changes from 1950 to 2008 over global land. The use of multiple variables in the analysis should alleviate the deficiencies associated with individual drought indices and provide increased confidence. Here, land precipitation data were derived by merging the monthly anomaly data from Dai et al.[96] for the period before 1948, Chen et al.[97] for 1948–1978, and Huffman et al.[98] for 1979 to present. The merging was done through re-scaling the different data sets to have the same mean of Ref 98 over a common data period (1979–1996). Surface air temperature data used for the PDSI calculation were derived, as in Dai et al.,[36] by combining the HadCRUT3 anomalies[100,101] and CRU climatology, both from http://www.cru.uea.ac.uk/cru/data/temperature/. We also examined the newly released GPCC v4 gridded land precipitation data from 1901 to 2007 (ftp://ftp-anon.dwd.de/pub/data/gpcc/html/fulldata_download.html) and found that for the period since around 1950, the GPCC v4 showed changes similar to our merged precipitation data, but for 1901–1949 the GPCC v4 showed different change patterns that are inconsistent with previous analyses.[96] Unlike Dai et al.,[96] the GPCC v4 product has data over areas without rain-gauges nearby, often filled with climatological values that make it difficult to assess which regions had no observations and thus should be skipped in the analysis.

Figure 5 shows the trend maps for annual surface air temperature, precipitation, and runoff (inferred from streamflow records) since around 1950. From 1950 to 2008, most land areas have warmed up by 1–3°C, with the largest warming over northern Asia and northern North America (Figure 5(a)). During the same period, precipitation decreased over most of Africa, southern Europe, South and East Asia, eastern Australia, Central America, central Pacific coasts of North America, and some parts of South America (Figure 5(b)). As a result, runoff over river basins in these regions has decreased (Figure 5(c)). The broadly consistent trend patterns between the independent records of precipitation and streamflow suggest that the broad patterns exhibited by the precipitation data (Figure 5(b)) are likely reliable. The precipitation change patterns are also consistent with satellite-observed vegetation changes, for example, over Australia since the 1980s.[102]

To account for the basic effect of temperature on surface water balance, monthly PDSI from 1850 to 2008 was calculated using the precipitation and temperature data used in Figure 5 with the Thornthwaite (an update to Dai et al.,[36] referred to as PDSI) and Penman-Monteith [Eq. (4.2.14) of Shuttleworth[17]; referred to as PDSI_pm] equation

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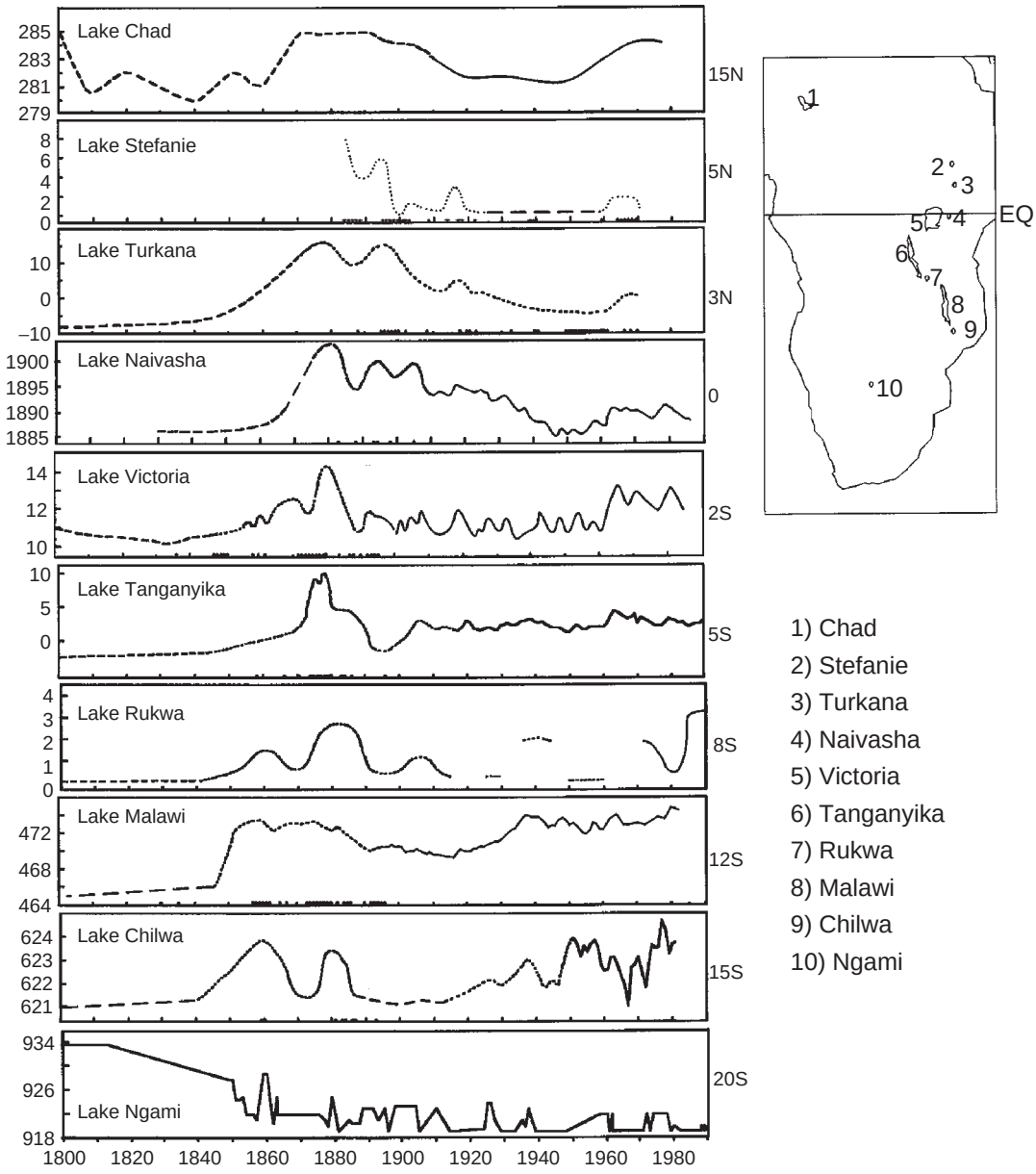


FIGURE 4 | Historical fluctuations in African lake levels since 1800 (higher values for wet periods). Except for Lake Ngami, solid lines indicate modern measurements, short dashed lines indicate historical information, and long dashed lines indicate general trends. (Reprinted with permission from Ref 79. Copyright 2001 Springer.)

for PE, separately. In addition, the self-calibrated PDSI of Wells et al.[42] with the Penman-Monteith PE (sc_PDSI_pm) was also calculated. Besides the precipitation and temperature data, additional forcing data of surface specific humidity, wind speed, and air pressure from the NCEP/NCAR reanalysis were used, together with cloud cover from surface observations[103] and surface net solar radiation from the Community Land Model version 3 (CLM3) simulation,[29] in which observed cloud cover[29] was used to estimate surface downward solar radiation. Surface net longwave radiation was estimated using observed near-surface air temperature, vapor pressure and cloud fraction based on Eq. (4.2.14) of Shuttleworth.[17] We emphasize that large uncertainties likely exist in the data for surface wind speed and radiation used here, as gridded, high-quality data for these fields are unavailable over the global land. Because of this, the PDSI results may not fully reflect the impact of the actual changes in wind speed[104] and radiation on aridity since 1950.[47] More details on the PDSI characteristics are given in Dai.[105]

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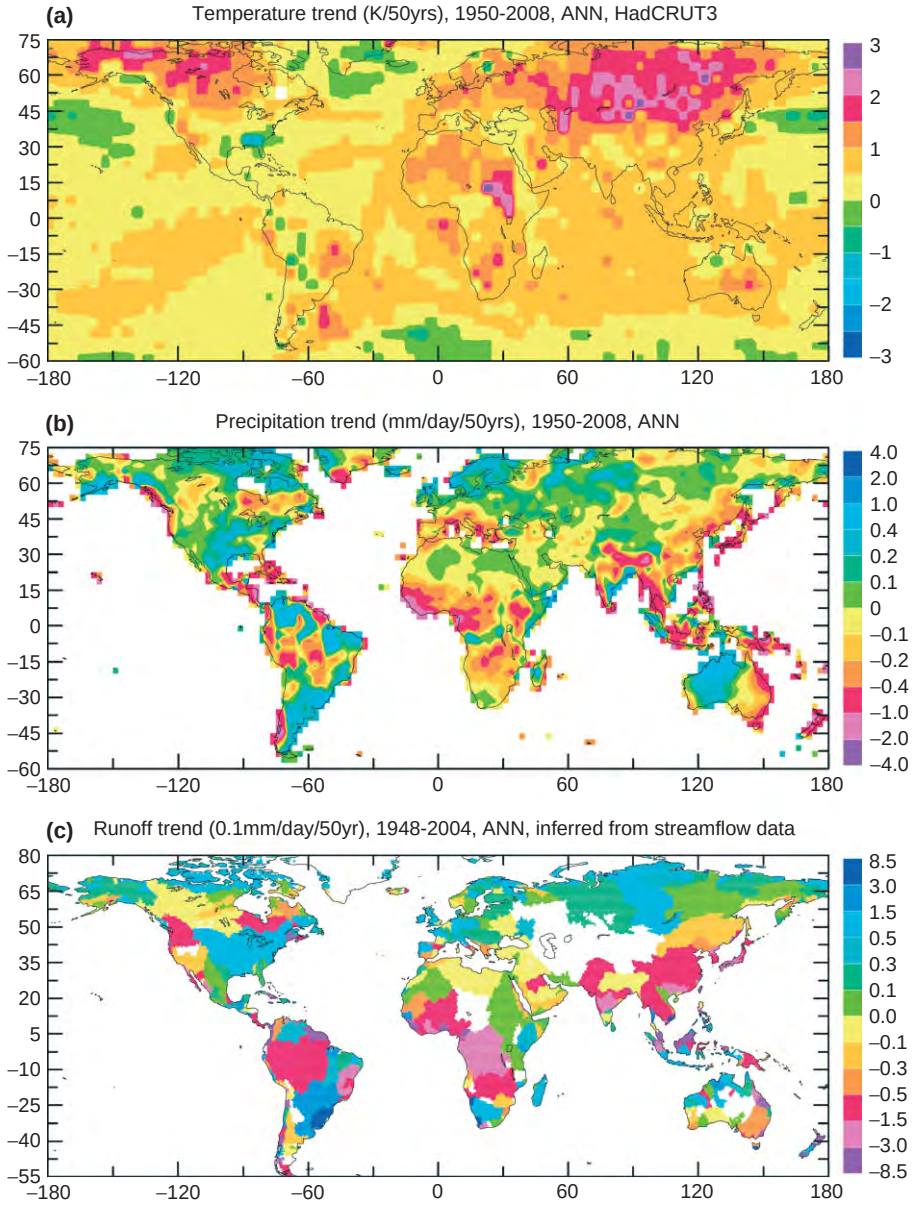


FIGURE 5 | Trend maps for observed annual (a) surface air temperature (from HadCRUT3: http://www.cru.uea.ac.uk/cru/data/temperature/), (b) precipitation (see text for data sources), and (c) runoff inferred from streamflow records. (Panel c reprinted with permission from Ref 99. Copyright 2002 American Meteorological Society.)

As in Dai et al.,[36] Figure 6 shows that global PDSI fields from 1900 to 2008 contain two robust modes of variability, with the first mode representing a long-term trend (Figure 6(a)) of drying over Africa, South and East Asia, eastern Australia, northern South America, southern Europe, and most of Alaska and western Canada (red areas in Figure 6(b)). This mode is expected given that a similar trend mode is seen in land precipitation fields.[96] The second mode is associated with the ENSO, because its temporal variations are correlated with an ENSO index (red line in Figure 6(c)) and its spatial patterns (Figure 6(d)) resemble those of ENSO-induced precipitation anomalies.[106] The fact that the global PDSI can capture two physically sound modes provides some confidence for using it as a proxy of aridity over global land, besides its correlation with available observations of soil moisture and streamflow.[36]

Figure 7 compares the trend patterns in PDSI, PDSI_pm, sc_PDSI_pm, and top-1 m soil moisture content from the CLM3 simulation forced with observed precipitation, temperature, and other atmospheric forcing (see Ref 29 for details). Although the CLM3 simulation accounts for the effect of cloud-induced

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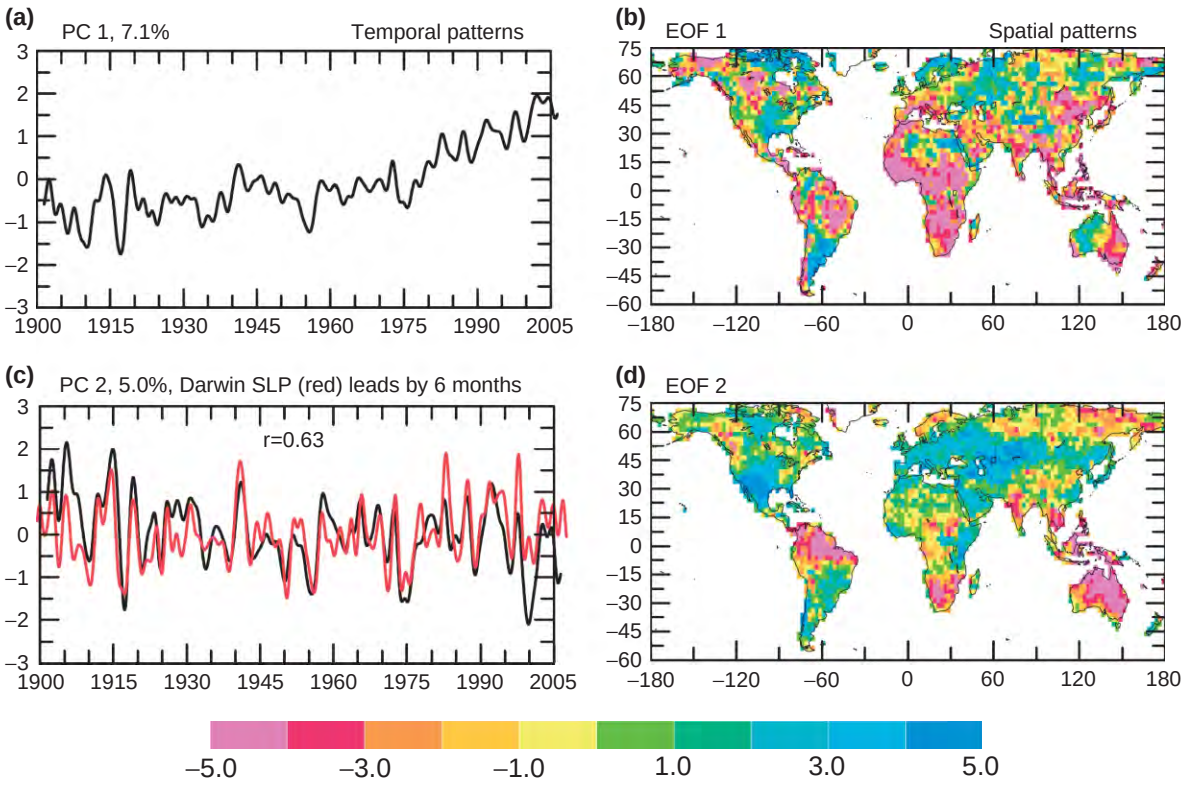


FIGURE 6 | (left) Temporal (black) and (right) spatial patterns of the two leading EOFs of monthly PDSI from 1900 to 2008 (normalized by its standard deviation prior to the EOF analysis). Red (blue) areas are dry (wet) for a positive temporal coefficient on the corresponding PC time series [e.g., the red (blue) areas in panel (b) represent a drying (moistening) trend whose temporal pattern is shown in panel (a)]. Variations on <2-year time scales were filtered out in plotting the left panels (but retained in the EOF analysis). Also shown in panel (c) is the normalized Darwin mean sea-level pressure anomaly shifted to the right (i.e., lead) by 6 months to obtain a maximum correlation ($r = 0.63$) with the PC 2 time series. (a) The percentage variance explained by the EOF is shown on the top of the left panels.

changes in radiation on evaporation, data for surface wind speed, which affects surface evaporation,[104] were taken directly from the NCEP/NCAR reanalysis and thus may not reflect actual changes. Furthermore, the CLM3 has deficiencies in simulating snow hydrology, permafrost, ground water, and other processes. Nevertheless, the CLM3 simulates the land surface processes, including evaporation and soil moisture, in a much more comprehensive way than the Palmer model for PDSI, and the CLM3 simulation captures most of the observed variations and changes in available soil moisture and streamflow records over the globe.[29,99] Thus, the CLM3-simulated soil moisture provides another measure of aridity and wetness.

The trends of the PDSI, PDSI_pm, and sc_PDSI_pm from 1950 to 2008 are very similar (Figure 7(a)–(c)), with some quantitative differences over Brazil, southern Africa, Australia, and a few other places, and slightly smaller magnitudes for the sc_PDSI_pm trend as it is calibrated to a narrower range.[105] This suggests that the PDSI trends are not sensitive to the PE calculations over most land areas, given the observed cloud cover changes and the surface wind and humidity from the NCEP/NCAR reanalysis. Furthermore, Figure 7 shows that the three forms of the PDSI and the CLM3-simulated soil moisture exhibit similar trend patterns, with some regional differences, e.g., over Indonesia. For instance, both the PDSI and soil moisture suggest drying during the last 50–60 years over much of Africa, East and South Asia, eastern Australia, southern Europe, Alaska and northern Canada (except the Arctic areas), while it has become wetter in the United States and most of Western Australia. To the first order, these patterns are similar to those for trends in precipitation (Figure 5(b)) and runoff (Figure 5(c)), except for the northern high latitudes (e.g., Siberia and Alaska) where the upward runoff trend might have partly resulted from thawing of the permafrost, which is not well simulated in the CLM3 and not at all in the Palmer model, or due to errors in the precipitation data.[99,107] Given that precipitation largely controls the surface water balance over most land areas, it is

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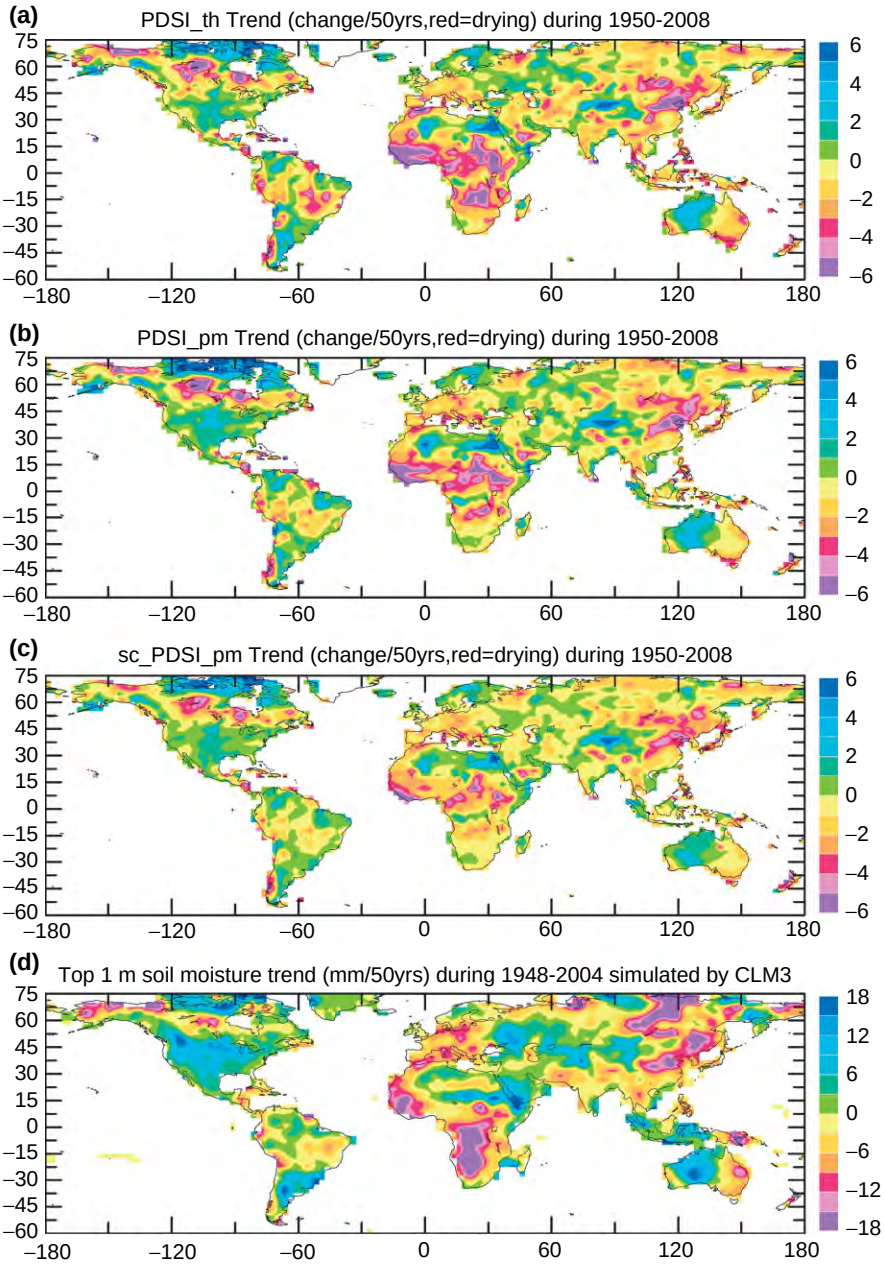


FIGURE 7 | Maps of annual trends (red = drying) from 1950 to 2008 in PDSI (change per 50 years) with potential evapotranspiration (PE) calculated using the (a) Thornthwaite and (b) Penman-Monteith (PM) equation, and (c) annual trends in self-calibrated PDSI with the PM potential evaporation. Also shown (d) is the trend in top-1 m soil moisture content (mm/50 years) from 948 to 2004 simulated by a land surface model (CLM3) forced by observation-based atmospheric forcing (see Ref 29 for details).

not unexpected that the PDSI from the simple Palmer model can broadly reproduce the soil moisture trend patterns from the much more comprehensive CLM3. We also note that the trend in the CLM3-simualted soil moisture (Figure 7(d)) is broadly comparable with those simulated by a different land surface model with different forcing data for 1950–2000 by Sheffield and Wood.[95]

Figure 8 shows the annual time series averaged over global (60°S–75°N) land since 1950 for the PDSI, PDSI_pm, and top-1 m soil moisture content from two CLM3 simulations that were forced with different intra-monthly forcing and different monthly data for surface wind speed and humidity, together with the PDSI and PDSI_pm computed using all the forcing data except with fixed temperature (dashed

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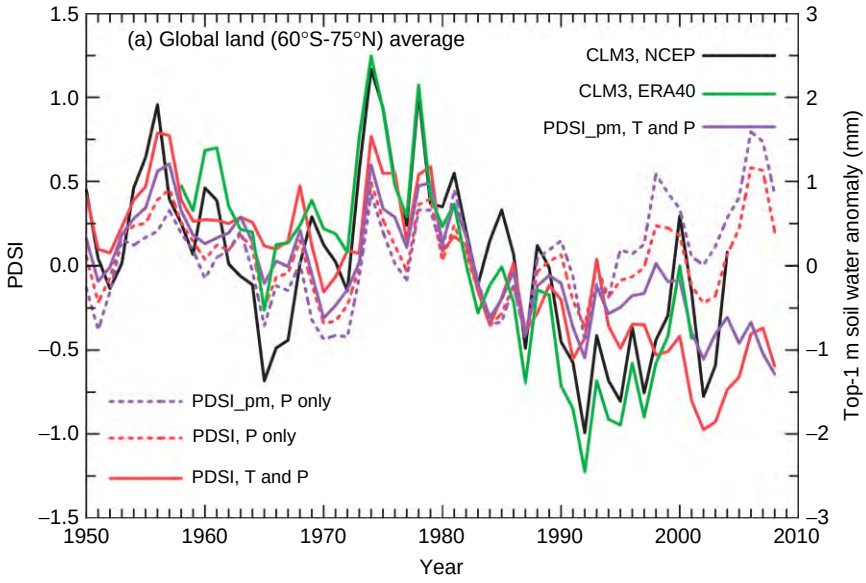


FIGURE 8 | Global land (60°S–75°N) averaged annual time series of top 1 m soil moisture anomaly (mm) simulated by a land surface model (CLM3) forced with observation-based estimates of monthly temperature, precipitation, and solar radiation with intra-monthly variations from the NCEP-NCAR (black) and ERA-40 (green) reanalysis (see Ref 29 for details), compared with the similarly averaged PDSI time series computed with both observed temperature and precipitation (red solid line for PDSI with Thornthwaite PE and magenta for PDSI with Penman-Monteith PE) and precipitation only (i.e., no temperature changes, dashed lines). Results for averages over 40°S–40°N land areas are very similar. The SC-PDSI_pm is similar to the PDSI_pm.

lines). Results for sc_PDSI_pm are similar to those for PDSI_pm[105] and thus not shown in Figures 8 and 9. Although there are differences among the curves, they show similar year-to-year variations and all exhibit a sharp downward (i.e., drying) trend from the late 1970s to the early 1990s. Since the early 1990s, the CLM3-simulated soil moisture shows a slight recovery, while the PDSI continues to decrease. The PDSI_pm recovers slightly in the mid-to-late 1990s but resumes the downward trend since around 1999, whereas the PDSI and PDSI_pm with fixed temperature shows an upward trend since the middle 1980s.

Defining the bottom 20 percentiles of the monthly PDSI, PDSI_pm and soil moisture as the dry spells locally, one can compute the global dry area as a percentage of total land area. Figure 9 shows that the percentage dry area stayed around 14–20% from 1950 to 1982, when it experienced a sharp jump (by ~10%) due to the 1982/83 El Niño, which reduced precipitation over may land areas.[106] Thereafter, an upward trend is evident in all but the PDSI and PDSI_pm with fixed temperature cases (dashed lines in Figure 9), which show little trend from 1983 to 2008. We note that the PDSI case tends to overestimate the recent drying compared with the PDSI_pm and CLM3 cases.

These results suggest that precipitation was the dominant driver for the changes in the terrestrial water budget before the early 1980s; thereafter, surface warming and cloud-induced changes in solar radiation and other fields (i.e., wind speed and humidity) also became important. Furthermore, the PDSI_pm appears to be a more reasonable measure of aridity than the original PDSI, as the PDSI_pm also considers changes in surface radiation and other fields and thus is more comparable to the CLM3 simulations, although the trend patterns are similar (Figure 7). The sc_PDSI_pm is very similar to PDSI_pm, with slightly reduced magntitudes as a result of the local calibration.

Can the Recent Changes be Attributed to Human Activities?

The sharp decreases in the PDSI and soil moisture from the late 1970s to the early 1990s (Figure 8) mainly result from precipitation decreases in Africa and East Asia. As mentioned above, the recent drought in Africa is related to SST pattern changes in the Atlantic and steady warming in the Indian Ocean.[108] The warming in the Indian Ocean is likely related to recent global warming, which is largely attributed to human-induced GHG increases.[90] The southward shift of the warmest SSTs in the tropical Atlantic is, however, likely a natural variation because GHG-induced warming is larger in the North Atlantic than in the South Atlantic Ocean,[6] although the role of anthropogenic aerosols[109] cannot be ruled out. Over East Asia, there is a decadal change around the late 1970s in rainfall patterns and associated summer monsoon circulation, which has become weaker since the late 1970s.[76,77] Increased aerosol loading from human-induced air pollution[110] and warming in tropical SSTs[77] may both have played a major role for the rainfall changes over East Asia. Model simulations also suggest that increased aerosol loading over the Northern Hemisphere may have played an important role in the recent drying over the Sahel and other tropical precipitation changes;[109] however, current models still have difficulties in simulating the

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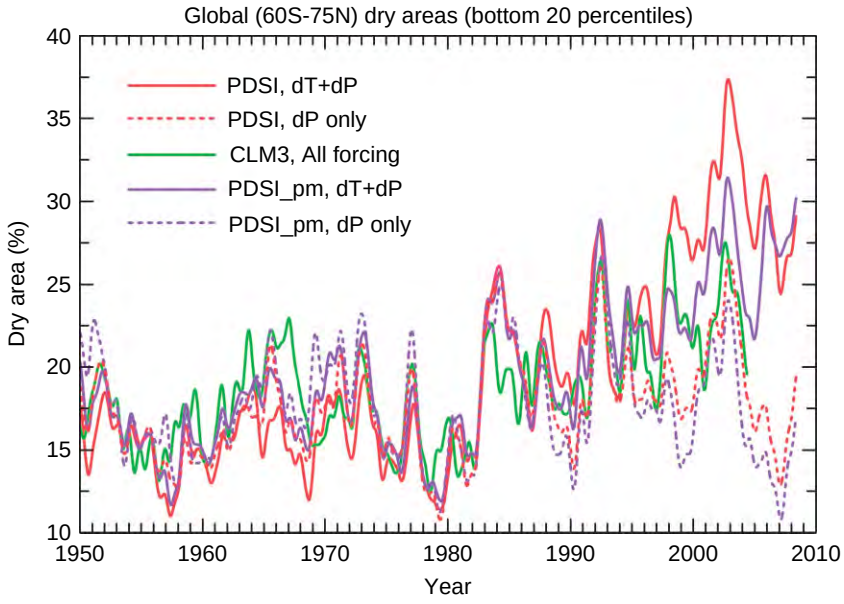


FIGURE 9 | Time series of global dry areas (defined locally as the bottom 20 percentiles) as a percentage of the global (60°S–75°N) land area based on the CLM3-simulated top-1 m soil moisture content (green), and PDSI calculated with both observed precipitation and temperature and Thornthwaite (red solid line) and Penman-Monteith (magenta solid line) PE, and with precipitation only (dashed lines). Monthly data were used in the PDSI and PE calculations with variations on <12-month time scales were filtered out before plotting.

underlying physical processes because of large model biases in tropical precipitation.[111]

A large part of the recent drying (Figure 9) is related to the shift toward more intense and frequent warm events (i.e., El Niños) of ENSO since the late 1970s.[112] This is because El Niños often reduce precipitation over many low-latitude land areas.[71,72,106] This shift in ENSO is statistically a rare event, but it is unknown whether this is related to recent global warming. Some climate models predict an El Niño-like warming pattern in the tropical Pacific under increased GHGs, but it is not a robust response in all models.[113–115] Given that current climate models still have large deficiencies in simulating ENSO and other tropical variability,[116,117] we cannot attribute the recent ENSO shift (and thus the related jump toward drying over land) to anthropogenic forcing or natural variability.

Besides the El Niño-related drying, the above results also show that the recent surface warming has enhanced evaporative demand over land and contributed to the drying since the 1980s. Because a large part of the recent surface warming is attributed to human-induced GHG increases,[90] we can conclude that anthropogenic GHG increases have contributed to the recent drying over land. Furthermore, the increased GHGs likely have contributed to the warming in the Indian Ocean and the tropical Pacific, which in turn have contributed to the drying in Africa and East Asia, respectively. Therefore, we can conclude that human activities have contributed significantly to the recent drying over land, although natural variations in ENSO, tropical Atlantic SSTs, and Asian monsoons also have played a large role.

HOW WILL DROUGHTS CHANGE IN COMING DECADES?

In this section, I present an assessment of how droughts might change based on future climates simulated by numerical models. It is of a great concern that extreme climate events such as droughts are expected to experience large percentage changes.[118] As the land surface warms up due to increased downward longwave radiation from increased water vapor and other GHGs, atmospheric demand for water vapor (i.e., PE) could increase,[119,120] as shown by the time series differences between the dP and dP + dT cases in Figures 8 and 9. However, other factors such as surface net solar radiation, humidity, and wind speed also affect PE. If atmospheric water supply (i.e., precipitation) over a region does not match or exceed increases in PE, then aridity would increase.

Figure 10[114] shows the IPCC AR4 multi-model ensemble-mean change from 1980–1999 to 2080–2099 under the SRES A1B (a medium emissions) scenario for annual (a) precipitation, (b) soil moisture, (c) runoff, and (d) evaporation. Unlike evaporation, which increases over most of the globe except for a few arid land regions and a few oceanic areas (where cooling occurs), precipitation shows widespread decreases around the subtropical zones. This precipitation decrease is attributed to the widening of the descending branches of the Hadley circulation[121] and increased atmospheric stability at the margins of tropical convection.[122,123] Over land, however, the change patterns are similar between evaporation and precipitation, which further suggests that evaporation over land is controlled primarily

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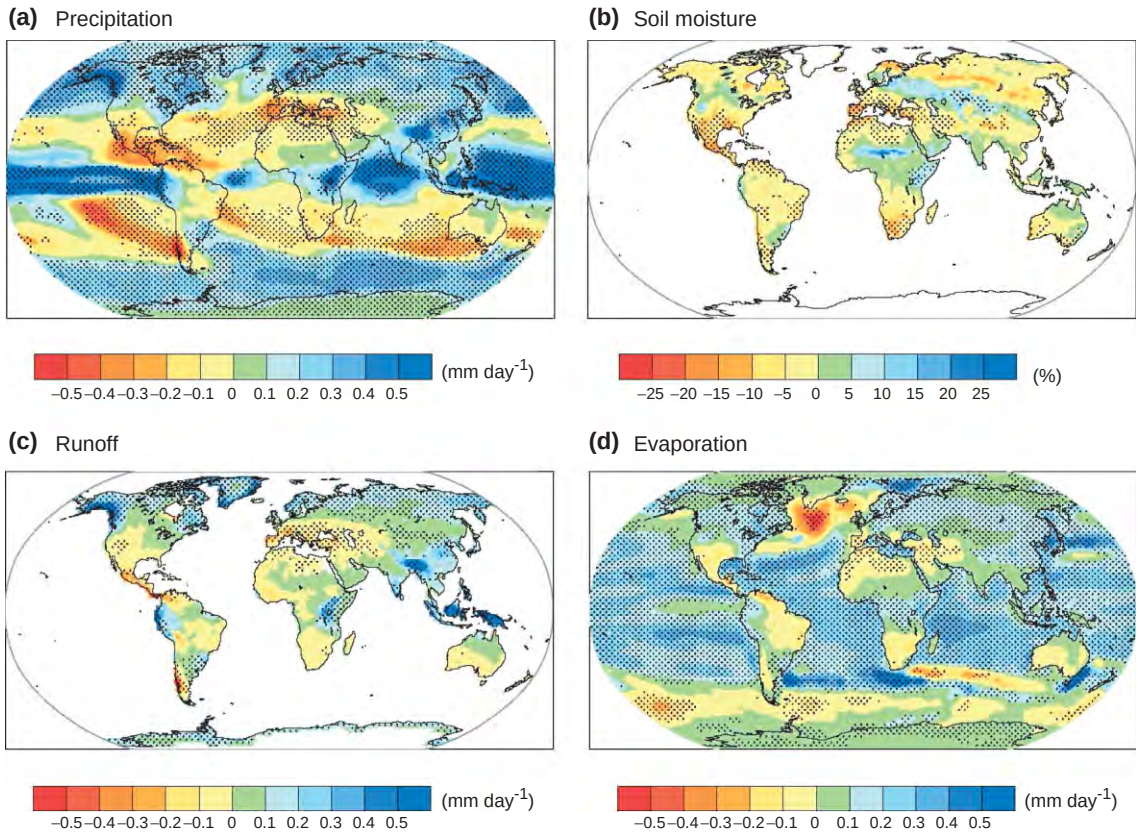


FIGURE 10 | Multi-model mean changes from 1980–1999 to 2080–2099 under the SRES A1B scenario in annual (a) precipitation (mm/day), (b) soil moisture (%), (c) runoff (mm/day), and (d) evaporation (mm/day). The stippling indicates where at least 80% of the models agree on the sign of the mean change. (Reprinted with permission from Ref 114. Copyright 2007 Cambridge University Press.)

by precipitation.[29] Runoff change patterns generally follow those of land precipitation (Figure 10(a) and (c)), which is the main driver for runoff.[29] On the other hand, soil moisture shows quite different change patterns (Figure 10(b)) that indicate drying over most of the land areas including most of the northern mid-high latitudes, where precipitation is increased. Even at low latitudes (e.g., southern Asia and northwestern South America), soil moisture changes do not always match precipitation changes (Figure 10). This demonstrates that one should not use total precipitation alone to measure changes in aridity or drought, as done in many studies.[122,123] Increased heavy precipitation and reduced light to moderate rain[124,125] can increase the runoff to precipitation ratio, and increases in surface air temperature and radiative heating can lead to higher atmospheric demand for moisture. These processes can result in drier soils even if the precipitation amount increases. Figure 10 also shows that many of the AR4 models produce different soil moisture changes (of opposite sign) over many regions where they agree on the sign of changes in temperature,[114] precipitation, evaporation, and runoff, such as the northern high latitudes. This implies large uncertainties in simulating land hydrology and soil moisture response in current models.

Analyzing soil moisture data from the IPCC AR4 simulations from 15 coupled models under the SRES A1B scenario, Wang[126] found general drying over most of the global land except part of the northern mid- and high-latitudes during the non-growing season and warned a world-wide agricultural drought by the late 21st century. Examining soil moisture data from eight AR4 models, Sheffield and Wood[127] found that global soil moisture decreases in all of the models for all scenarios with a doubling of both the spatial extent of severe soil moisture deficits and frequency of short-term (4–6-month duration) droughts from the mid-20th century to the end of the 21st century, while long-term (>12 months) droughts become three times more common.

Besides soil moisture, other drought indices also have been computed using surface fields from model outputs and used to assess future drought changes.[37,38] Using data from the Hadley Centre atmospheric general circulation model (AGCM) and

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other AGCM 2× CO_2 equilibrium runs, Burke and Brown[38] computed four difference drought indices, including the PDSI_pm. They found that, despite regional differences, all of the indices that take atmospheric moisture demand into account suggest a significant increase in global drought areas when CO_2 doubles.

Here monthly PDSI_pm and sc_PDSI_pm were computed using multi-model ensemble-mean monthly data of precipitation, surface air temperature, specific humidity, net radiation, wind speed, and air pressure from 22 coupled climate models participated in the IPCC AR4,[128] and used to assess changes in aridity over global land. Thus, these PDSI values may be interpreted as for the multi-model mean climate conditions. As the PDSI is a slow varying variable, the lack of high-frequency variability in the ensemble-mean climate is unlikely to induce mean biases.

Figure 11 shows the select decadal-mean sc_PDSI_pm maps from the 1950s to 2090s from the IPCC 20th century (20C3M) and SRES A1B scenario simulations. Results for PDSI_pm are similar with slightly larger magnitudes. A striking feature is that aridity increases since the late 20th century and becomes severe drought (sc_PDSI_pm <-3) by the 2060s over most of Africa, southern Europe and the Middle East, most of Americas (except Alaska and northern Canada, Uruguay, and northeastern Argentina), Australia, and Southeast Asia; while it becomes progressively wetter over most of central and northern Eurasia, Alaska and northern Canada, and India. This feature is also evident in the trend maps of PDSI_pm shown by Burke et al.[37] using data from the Hadley Centre coupled model alone under the SRES A2 (a high emissions) scenario. Increased precipitation (Figure 10(a)) is the main cause for the wetting over central and northern Eurasia, northern North America, India, Uruguay and northeastern Argentina, and eastern central Africa; while precipitation decreases over Central America, the Southwest United States, the Mediterranean region, and southern Africa are largely responsible for the drying there. Over many mid-latitude and subtropical regions (e.g., northern Australia and Southeast Asia, Figure 10(a)), however, increased evaporation is a major cause for the increased aridity (Figure 11).

The patterns shown in Figure 11 are consistent with published regional analyses of projected aridity changes in the 21st century, often by a smaller number of models than used here. These include decreases in precipitation-minus-evaporation over southwestern North America[129] and Mexico,[51] streamflow decreases over most of (except northern) Europe,[130] increases in drought frequencies over most of Australia.[131] Figure 11 is also broadly consistent with the trends in model-simulated soil moisture[126,127] (Figure 10), and the PDSI_pm trends of Burke et al.[37] and Burke and Brown.[38]

We emphasize that quantitative interpretation of the PDSI values shown in Figure 11 requires caution because many of the PDSI values, which are calibrated to the 1950–1979 model climate, are well out of the range for the current climate, based on which the PDSI was designed. Nevertheless, Figure 11, together with all the other studies cited above, suggests that drought may become so widespread and so severe in the coming decades that current drought indices may no longer work properly in quantifying future drought.

SUMMARY AND CONCLUDING REMARKS

In this article, a brief review is presented on the definition of drought, common drought indices, and recent literature on the occurrence and causes of drought in the 20th and earlier centuries, followed by an updated analysis of global aridity changes from 1950 to 2008 using multiple sources of data. Projected aridity changes in the 21st century are also presented based on published studies and our new analysis of model output from simulations under the SRES A1B scenario by 22 coupled models that participated in the IPCC AR4.

Recent studies revealed that persistent dry periods lasting for multiple years to several decades have occurred many times during the last 500–1000 years over North America, West Africa, and East Asia. These historical droughts are linked to tropical SST variations, with La Niña-like SST anomalies in the tropical Pacific often leading to widespread drought in North America, and El-Niño-like SST warming in the Pacific causing drought in East China. Over Africa, the southward shift of the warmest SSTs in the tropical Atlantic and warming in the Indian Ocean are the main causes of the recent Sahel droughts. Land cover changes and local feedbacks, such as increased dust loading during the Dust Bowl drought over North America in the 1930s, decreased vegetation cover in the Sahel during the 1970s and 1980s, and reduced local evaporation and relative humidity during droughts in general, may enhance and prolong droughts triggered by tropical SSTs or other anomalies in atmospheric circulations.

Since the middle 20th century, global aridity and drought areas have increased substantially, mainly due to widespread drying since the 1970s

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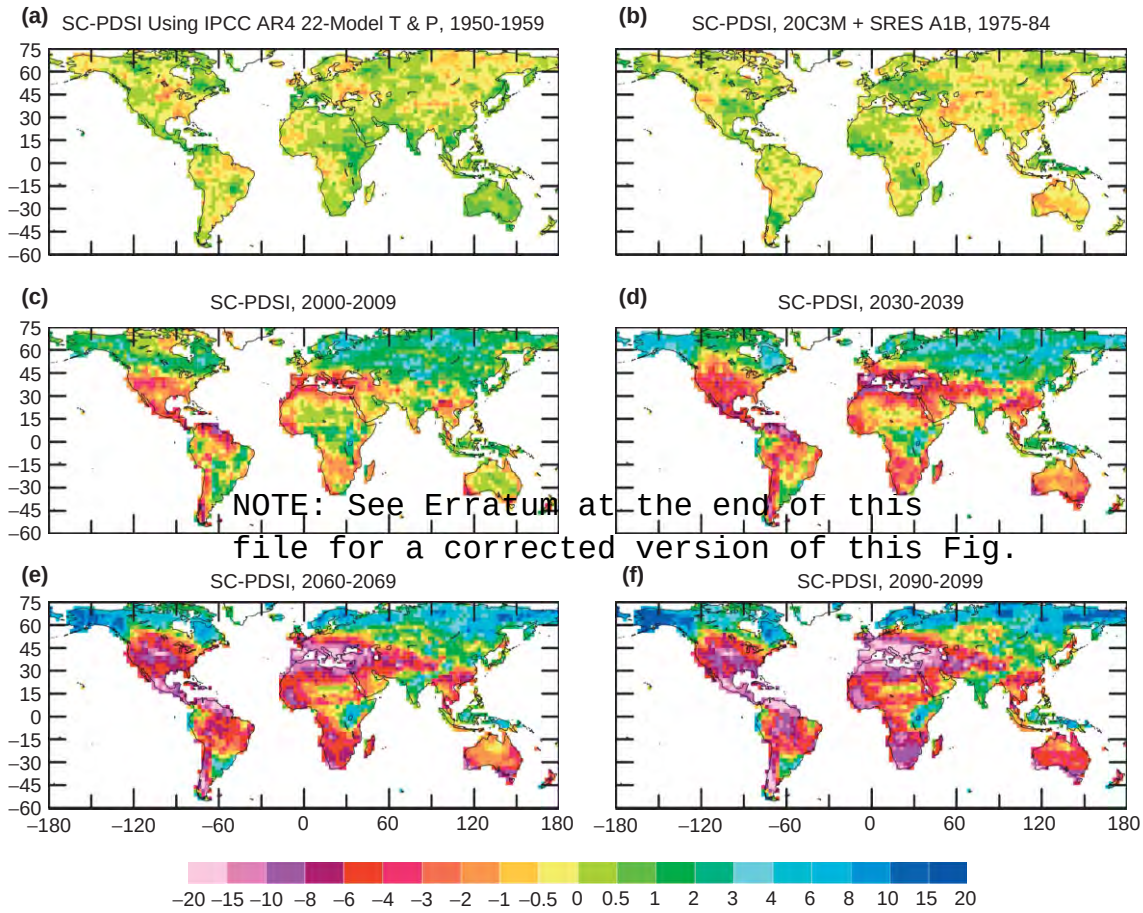


FIGURE 11 | Mean annual sc-PDSI_pm for years (a) 1950–1959, (b) 1975–1984, (c) 2000–2009, (d) 2030–2039, (e) 2060–2069, and (f) 2090–2099 calculated using the 22-model ensemble-mean surface air temperature, precipitation, humidity, net radiation, and wind speed used in the IPCC AR4 from the 20th century and SRES A1B 21st century simulations.[128] Red to pink areas are extremely dry (severe drought) conditions while blue colors indicate wet areas relative to the 1950–1979 mean.

over Africa, southern Europe, East and South Asia, eastern Australia, and many parts of the northern mid-high latitudes. Although natural variations in ENSO, tropical Atlantic SSTs, and Asian monsoons have played a large role in the recent drying, the rapid warming since the late 1970s has increased atmospheric demand for moisture and likely altered atmospheric circulation patterns (e.g., over Africa and East Asia), both contributing to the recent drying over land. Since a large part of the recent warming is attributed to human-induced GHG increases,[90] it can be concluded that human activities have contributed significantly to the recent drying trend.

Reduced pan evaporation, a proxy for PE, over Australia, East China, and other regions during recent decades[104] may alleviate the drying trend induced primarily by precipitation, temperature, and cloudiness changes examined here. Nevertheless, the precipitation and streamflow records (Figure 5(b) and (c)) and previous studies[56,58,67] all show drying over East Australia and much of East China during the recent decades. This suggests that the effect of the reduced PE on aridity is likely secondary to that of recent changes in precipitation and temperature over these regions.

Coupled climate models used in the IPCC AR4 project increased aridity in the 21st century, with a striking pattern that suggests continued drying over most of Africa, southern Europe and the Middle East, most of Americas (except Alaska, northern Canada, Uruguay, and northeastern Argentina), Australia, and Southeast Asia. Some of these regions, such as the United States, have fortunately avoided prolonged droughts during the last 50 years mainly due to decadal variations in ENSO and other climate modes, but people living in these regions may see a switch to persistent severe droughts in the next 20–50 years, depending on how ENSO and other natural variability modulate the GHG-induced drying. As cuts to global GHG emissions are hard to

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materialize, geoengineering (e.g., by putting sulfate aerosols into the stratosphere) as the last resort to combat global warming has been proposed,[132] but it may cause widespread drought and other unintended adverse effects.[133,134]

Many of current AGCMs are capable of simulating the precipitation deficits during recent droughts over North America and Africa given the observed global (especially tropical) SST anomalies.[4–6,71,72] Further advances in model developments may make it possible to predict drought on seasonal to decadal time scales.[135] A big challenge for such predictions will be predicting tropical SST variations on seasonal to decadal time scales, which requires coupled GCMs (CGCMs) and estimates of future GHGs, aerosols, and other external forcing (e.g., the solar cycle and volcanic eruptions). However, current CGCMs still have large deficiencies in simulating tropical precipitation, ENSO, the intra-seasonal oscillation, and other tropical variability.[116,117,136] Substantial improvements will be required before the CGCMs can be used to predict tropical SST variations on seasonal to decadal time scales that would enable prediction of droughts over North America, Africa, Asia, Australia, and other parts of the world.

Besides the tropical deficiencies, current climate models still have large deficiencies in simulating precipitation frequency and intensity,[1,136] clouds, aerosols' effects, land hydrology, and other processes; and future emissions such as aerosol loading may be very different from those used in the IPCC AR4 21st century simulations. Furthermore, large regional differences exist among the models and among different drought indices.[38] It is also possible that the PM equation overestimates PE under the warming climate of the 21st century and that the current drought indices such as the PDSI may not be applicable to the future climate. On the other hand, the PDSI and the PM equation have worked for the current and past climates. The fact that they may not work for the 21st century climate itself is a troubling sign. Despite all these uncertainties, the large-scale pattern shown in Figure 11 appears to be a robust response to increased GHGs. This is very alarming because if the drying is anything resembling Figure 11, a very large population will be severely affected in the coming decades over the whole United States, southern Europe, Southeast Asia, Brazil, Chile, Australia, and most of Africa.

As alarming as Figure 11 shows, there may still be other processes that could cause additional drying over land under global warming that are not included in the PDSI calculation. For example, both thermodynamic arguments[124] and climate model simulations[125] suggest that precipitation may become more intense but less frequent (i.e., longer dry spells) under GHG-induced global warming. This may increase flash floods and runoff, but diminish soil moisture and increase the risk of agricultural drought.

Given the dire predictions for drought, adaptation measures for future climate changes should consider the possibility of increased aridity and widespread drought in coming decades. Lessons learned from dealing with past severe droughts, such as the Sahel drought during the 1970s and 1980s,[137] may be helpful in designing adaptation strategies for future droughts.

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Erratum

Advanced Review

Drought under global warming: a review

Aiguo Dai*

[Article in *WIREs Clim Change* 2010, 2:45–65. doi: 10.1002/wcc.81]

An error resulted from a discontinuity in reading the CMIP3 model data, which led to enlarged PDSI changes in Fig. 11. However, it does not change the drying patterns and the basic conclusions, although the quantitative references to Fig. 11 in the text of the paper may need to be adjusted accordingly. This error does not affect other results of the paper.

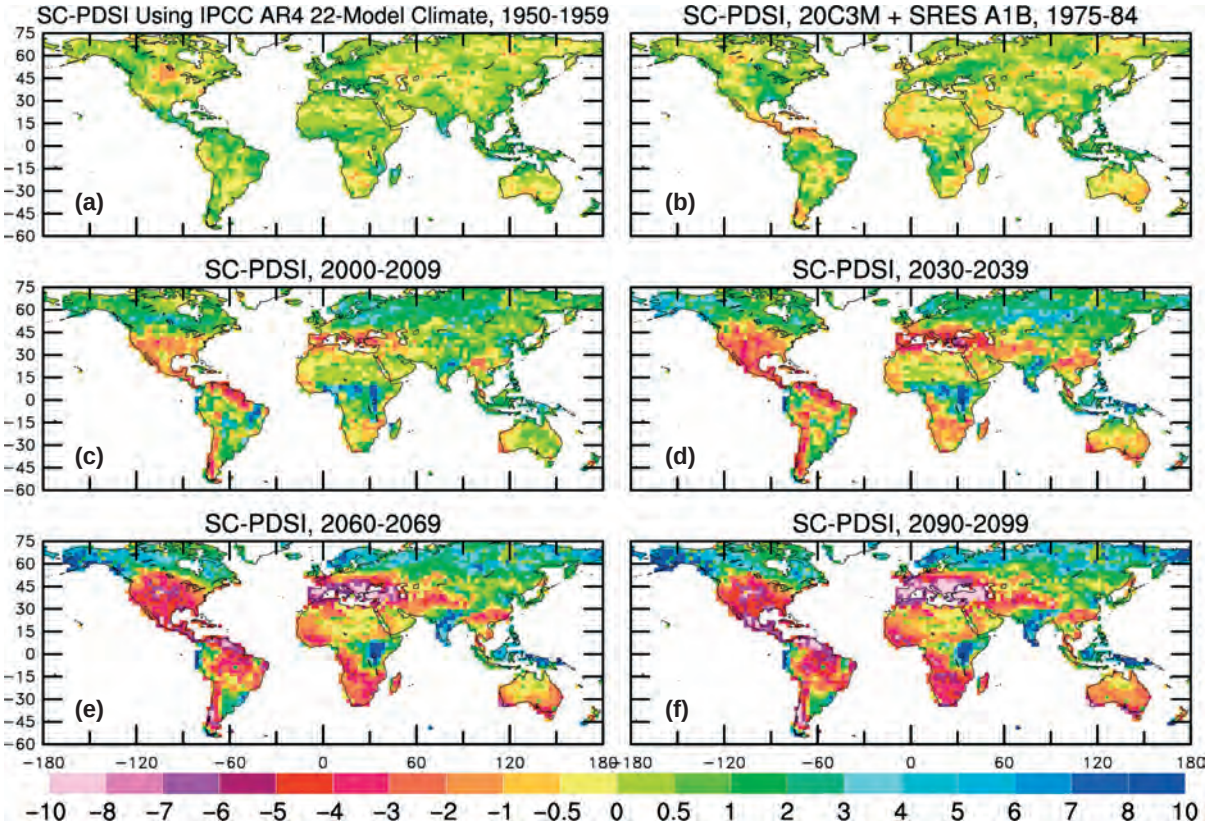


FIGURE 11 | (Corrected version) Mean annual sc-PDSI pm for years (a) 1950–1959, (b) 1975–1984, (c) 2000–2009, (d) 2030–2039, (e) 2060–2069, and (f) 2090–2099 calculated using the 22-model ensemble-mean surface air temperature, precipitation, humidity, net radiation, and wind speed used in the IPCC AR4 from the 20th century and SRES A1B 21st century simulations.128 Red to pink areas are extremely dry (severe drought) conditions while blue colors indicate wet areas relative to the 1950–1979 mean.

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http://www.sciencedirect.com/science/article/pii/S0921800914000615
Human and nature dynamics (HANDY): Modeling inequality and use of resources in the collapse or sustainability of societies

http://upriser.com/posts/study-predicts-impending-collapse-of-industrial-civilization

http://planetsave.com/2015/06/25/climate-change-induced-collapse-of-civilization-by-2040-reports-uk-foreign-office/
Scientific Model Indicates Climate Change-Induced Collapse of Civilization by 2040

https://www.newscientist.com/article/dn28046-extreme-weather-could-trigger-frequent-global-food-shocks/
Extreme weather could trigger frequent global food shocks

"Accuracy Check on Predictions of Near-Term Collapse" by Barton Paul Levenson
http://www.ajournal.co.uk/pdfs/BSvolume13(1)/BSVol.13%20(1)%20Article%202.pdf

http://www.realclimate.org/index.php/archives/2015/03/unforced-variations-march-2015/comment-page-5/#comment-627687
233 Barton Paul Levenson says:

http://www.lloyds.com/~/media/files/news%20and%20insight/risk%20insight/2015/food%20system%20shock/food%20system%20shock_june%202015.pdf
"Food System Shock" Food prices go up 500% by 2030. Lloyd's of London insurance

Submission Number: ***MBTL-SEPA-DEIS-0001431***

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Commenter: Dana Minium
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for hearing my comments: I have two businesses within a half mile of the proposed coal terminal and I am extremely worried about the impacts to my health, our employee's health, our customer's health, to our equipment, and to our customers belongings, vehicles, and boats. The DEIS, in my opinion, supports my concerns. There are many eye witnesses who speak of the dust problems from similar terminals. I am still trying to figure out why the DEIS did not find the dust to be more of a health issue and I would like you to re-examine the health affects to communities up and down the transportation corridors, by taking into consideration concerns from affected people and areas, and current studies that report such. The final EIS should look closer at real world examples of coal dust pollution in terminal communities. According to the DEIS coal dust and diesel contaminants will be an issue for our property since we are so close. Our property is pictured in the DEIS draft summary Figure S-1; that's how close we are. We have 10-20 people here on site every day. What about their health, our livelihood, our property value? Millennium plans to add 15-20 to the existing staff to reach the 135 employees they plan to have on site according to the DEIS. Why are their 15-20 new employees more important than our potential loss? We have been on site for over 30 years? (DEIS, S-13) I am concerned we will lose customers by having this plant near. The wind fiercely blows across our property from the direction of the proposed facility nearly every afternoon since I have been here for the past 20+ years. We actually get small dust-bowl swirls going through our yard often as the wind blows from the direction of the proposed facility. This is my eye witness testimony, not 3rd party data. I am also very concerned about my property values decreasing by having a coal terminal so close. I have listened to testimony from local realtors reporting potential clients choosing not to relocate here if the coal terminal comes in. This community already has a problem attracting professionals to care for, teach, and represent our community. The final EIS should more adequately consider the economic and reputational risk to my business, to Longview, and to other communities impacted by coal trains and dust. Consider real estate value decline, and the fact that many modern, clean businesses will not move to a coal town. These are very significant impacts to us. We deserve not to be continually dumped on. I am also very concerned about pollution from possible fires reaching our property. Again, we have personal working here daily and who will protect us? I am concerned about the lighting and sounds. Again, we have employees and customers here daily and we have onsite managers living here that will be affected day and night. We have a neighborhood just behind us. Our property butts up to Mt. Solo and is filled with birds: hawks, bald eagles, song birds, owls, and deer, coyote, and bear. How will the noise, light glare, visual dust and non-visual microbes affect this wildlife? And, I am a steward of this earth. I want to leave our community and our generations to come, a healthy planet with clean air to breath and salmon still in our river. I cannot with good moral conscious support a terminal whose "Proposed Actions remaining (after mitigation) projected increase in greenhouse gas emissions would still be significant and adverse under the greenhouse gas emission intensity considerations used for the analysis." (DEIS Summary) My daughter is doing biology research at WSUV about invasive plant species and she has brought up concerns about these additional 840 vessels per year, and the practice of discharging ballast water. The DEIS says it would be regulated at the state and federal level, so we can hope that during this permitting process the state and federal agencies will take into consideration the sheer size of the increase in ship traffic and the effects of invasive species in our waterways. Let alone the admitted potential for spills and accidents every year and the significant impact that will have to our water, wildlife, and aquatic life! Not acceptable. The DEIS repeatedly states that the impacts from the proposed action could adversely affect many areas, yet then writes off those potential impacts as minimal because of having to follow guidelines and quick clean up. Why would Washington sugar coat potential impacts from a proposed project that has already costs millions in years of study and will cost millions to protect the communities and environment it touches, only to have to pay again to clean up the hazardous spills it will eventually create? This seems ludicrous to me. Washington State is moving to LESS emissions goals, this project will increase emissions equal to 7 coal fired plants? Really? This is an oxymoron in my opinion.

Minium, Dana (1431)

The DEIS says O rom a vessel or train could have significant potential impacts on water quality and the magnitude would depend on location, volume, weather, and tidal conditions, two of which are uncontrollable. The DEIS says coal could enter water as either dust or coal spill. Then it says the potential risk for exposure to toxic chemicals contained in coal would be relatively low because they tend to bind and not quickly or easily leach out. Interesting choice of words here; so the dust will enter the water… the risk is relative…. The chemicals do not always, yet tend, to bind…. And will eventually leach out, although not quickly or easily. This is what I mean by sugar coat, typing nice conclusions that don't really spell it out. It is not acceptable, giving what we are learning about our environment in today's world, that we expose our waterways, air, communities, land, fish, wildlife, and winged ones to these toxic chemicals. Especially since the risk involves uncontrollable factors, and carry unavoidable and significant adverse environmental impacts that could be reduced but NOT eliminated. Washington has spent millions of dollars to recover our salmon in the Columbia River and to protect Tribal harvest. The DEIS does show that the project will reduce access for tribal fishermen and will harm salmon habitat! What? Really? Not acceptable! I also would like to see this coal topping studied more thoroughly. Does it come off? Vibrate off? Break off in handling? Dissolve? All causing the effect to minimize or does it remain on the coal and is burned with the coal? If so, what does the burning of the surfactant cause? Does it wash off when the coal is sprayed down or falls into our waterways? What would stop the water spray from blowing into our waterway with coal dust in it as these MASSIVE piles of coal are continually sprayed down? And, I also have deep reserve in trusting Millennium. They have proven to say one thing and end up doing another. They started out telling us that it would be handling 5 million ton a year and now that is 44 tons a year! I have researched property near the proposed site, and Millennium has purchased more land down river under a different name. The shoreline properties are owned by LLC's that are not real clear who owns them. Several of them have foreign owners. It is my sense that our newest Port Commissioner travels to and has ties with some of these people. His family has also owned land in that area and has been involved in numerous lawsuits, including land related in that area. I would like this looked into also so the EIS takes into consideration that Millennium may have plans for expansion that they are keeping from this review and the public. All of this is public record on the Cowlitz Co. website and the Washington Secretary of State website. Also, in today's local paper (The Daily News, May 27th), there is an article that Arch Coal is selling its stake in Millennium. It states that in February, a report from a global research firm Wood Mackenzie, concluded that weak demand and plummeting prices made any new coal docks in the NW economically unviable. And in February, Cloud Peak Energy's accountants wrote off its rights to access Millennium's docks as essentially worthless, where it was previously valued at $5 million. What other values are not valid now with this new information? I believe many of the numbers from Millennium are exaggerated. This has been my personal experience since they have arrived in town. How is any of this good for Longview, Cowlitz County, Washington State and our neighbors? How about our global health? Are we mindful of fossil fuel danger or are we keeping our heads in the sand? I am not confident that the individual and cumulative impacts of this project are understood. The impacts are extraordinary in my opinion and I call for the No Action Alternative. Thank you for listening to my concerns. I will try to comment again once I read through more of the DEIS so I can offer more specific data backed concerns. Thanks again for taking on such a huge EIS and for listening to hours and hours and hours of our comments!

Minnes, Edward (0648)

Submission Number: ***MBTL-SEPA-DEIS-0000648***

Received: 5/20/2016 1:45:34 PM
Commenter: Edward Minnes
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. The economy depends on trade. It creates jobs working the railroads and ships, loading cargo at the ports, growing crops for export, and building the infrastructure necessary to support a trade-based economy. However, trade depends on permitting approval to construct this infrastructure. If the federal, state, or local government apply different permitting standards to projects exporting coal, they are creating a dangerous precedent that will make it hard to build new infrastructure needed to export other goods, like wheat or manufactured products. The environmental groups have a long history of challenging trade based projects in the northwest, such as Columbia river dredging, new rail facilities and/or export terminals. Governments shouldn’t threaten trade or the jobs that depend on it. I urge you not to be swayed by outside fanatics who do not care about our county or our people. The environmental review process for Millennium Bulk Terminals should be held to the same standard as every other port or infrastructure project. We have a very fair and comprehensive process in place, and I question the motives of those who say otherwise. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0002482***

Received: 6/10/2016 2:22:44 PM
Commenter: Chris Minuss
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0000747***

Received: 5/23/2016 1:54:14 PM
Commenter: Ronald Mischnick
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it's time Longview went back to work. This project will create additional revenue for a state that, like many others, can really use the economic boost. Through the entire construction process it will employ a significant amount of people and go a long way toward revitalizing Washington. I feel we should make this coal export terminal a reality. Thank you for considering my comments.

Submission Number: ***MBTL-SEPA-DEIS-0002776***

Received: 6/13/2016 2:17:40 PM
Commenter: William Missal
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Mitch, Roni (2410)

Submission Number: ***MBTL-SEPA-DEIS-0002410***

Received: 6/9/2016 6:17:45 PM
Commenter: Roni Mitch
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Longview is a town built on natural resources and import/export. I believe this project is a perfect fit for our community. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water â€" coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life.

Submission Number: ***MBTL-SEPA-DEIS-0001108***

Received: 5/24/2016 7:27:03 PM
Commenter: Jacob Mitchell
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the opportunity to weigh in on this development project in Longview. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. Our region is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal will help our recovery. Thank you for beginning the scoping process.

Submission Number: ***MBTL-SEPA-DEIS-0002806***

Received: 6/13/2016 2:31:31 PM
Commenter: Michael Mitrovich
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0003026***

Received: 6/13/2016 4:42:57 PM
Commenter: Michael Mitrovich
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003027***

Received: 6/13/2016 4:42:58 PM
Commenter: Michael Mitrovich
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003175***

Received: 6/13/2016 6:18:47 PM
Commenter: Ryan Mitrovich
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Miura, Madelyne (2669)

Submission Number: ***MBTL-SEPA-DEIS-0002669***

Received: 6/13/2016 12:46:44 PM
Commenter: Madelyne Miura
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002517***

Received: 6/11/2016 1:46:24 AM
Commenter: P Mizutani
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The extraction of coal is environmentally destructive, with whole surfaces of land blasted away to reach the underlying seams of coal. Coal mining leads all US industries in fatalities, more than 11 times greater than all other private industries. Once mined, the coal is washed and the resulting slurry contains polymer chemicals and heavy metals such as arsenic and mercury, typical components of mined rock. Storing the slurry is problematic because of leaching into water supplies in spite of containment strategies. The transport of the coal in open rail cars exposes all along the transport route to coal dust which is inhaled by the young and the old, the healthy and the infirm. The inhaled coal dust will lead to or exacerbate acute and chronic respiratory conditions such as asthma and emphysema. Another big issue is the safety of the tracks themselves, derailment leading to lost lives, property damage, and interruption of traffic and commerce, and environmental degradation. At the Longview terminal, the coal will be kept in open-air stockpiles before transfer to transport vessels. This again exposes the local communities to coal dust. Efforts to reduce this exposure with dust control and water sprayers are not effective enough. Once the coal reaches its Asian destination, the coal will be burned by industry and contribute to global climate change by emitting greenhouse gas. My conclusion is that the environmental impact of coal from the time of its extraction to its use by industry is too great to justify building the Longview coal terminal.

Moberg, Yvonne (2612)

Submission Number: ***MBTL-SEPA-DEIS-0002612***

Received: 6/13/2016 11:31:39 AM
Commenter: Yvonne Moberg
Organization: Powder River Energy
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I am in full support of this project, please consider approving this.

Submission Number: ***MBTL-SEPA-DEIS-0001507***

Received: 5/31/2016 2:25:14 PM
Commenter: Garron Mobley
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our economy and our families are suffering due to government overreach and regulations. We need to do something about this immediately before more citizens become adversely affected by these stifling regulations. We must support the proposed port at Longview that will facilitate employment for people to who are seeking opportunities and keep them gainfully employed for years to come.

Submission Number: ***MBTL-SEPA-DEIS-0001632***

Received: 5/31/2016 6:04:55 PM
Commenter: Jim Mohr
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The draft environmental study for Millennium Bulk Terminals coal export facility was sufficient. Please move forward. There are many benefits of the project that the community is waiting for. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. Thank you for accepting comments for this important project. Please make the necessary steps to move forward on its approval as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0002833***

Received: 6/13/2016 2:41:13 PM
Commenter: Darryl Mollenhauer
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Monroe, Wanda (0990)

Submission Number: ***MBTL-SEPA-DEIS-0000990***

Received: 5/24/2016 5:52:59 PM
Commenter: Wanda Monroe
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium's proposal is unprecedented and has far reaching economic implications. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0003060***

Received: 6/13/2016 5:10:57 PM
Commenter: James Montague
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment. Sincerely, James Montague
Tjmontague@Yahoo.com 82718

Submission Number: ***MBTL-SEPA-DEIS-0001650***

Received: 5/31/2016 6:15:55 PM
Commenter: Shelly Monteleone
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. Thank you for accepting comments for this important project. Please make the necessary steps to move forward on its approval as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001488***

Received: 5/31/2016 1:20:22 PM
Commenter: Heidi Montez
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The proposed Millennium Bulk Terminal on the Columbia River is a terrible idea. Not only is the coal industry economically useless, but this terminal would create a myriad of human health, and environmental disasters. Trains carrying coal from the interior to the coast pass through hundreds of communities, releasing up to 500 lbs of toxic coal dust PER RAIL CAR along the way! Coal dust not only causes debilitating respiratory disease (our health is NOT FOR SALE), but also contaminates farmland we depend on for food (our sustenance is NOT FOR SALE), watersheds (our clean water is NOT FOR SALE)! Coal trains pollute horrendous amounts, but they also cause unnecessary traffic in our communities, increasing back ups, causing accidents, and blocking emergency vehicles. All of these problems happen even BEFORE the train arrives at the terminal. Then, what if coal gets spilled into the Columbia River (which it inevitably would. Even the Environmental Impacts Statement says there are 'unavoidable negative impacts that could not be completely mitigated'.) The United States of America is a world leader with a robust economy, and it is embarrassing that we are not the FIRST to move away from fossil fuels to clean energy. We of all nations need to step up and use intelligent technology to meet energy demands. Coal is the dirtiest (and the least profitable!) of all fossil fuels. It is disgusting, embarrassing and irresponsible to even consider continuing the dying coal industry. Do the right thing and reject this dead end, destructive, disastrous proposal. The Columbia River and the Pacific Ocean are already suffering immense pollution that needs remediation. Are humans really ignorant enough to continue down this suicidal path of environmental rape? We are part of this earth, and we depend on it for survival. We can do better.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☑ Air Quality
- ☑ Human Health
- ☑ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☑ Coal Dust
- ☐ Greenhouse Gas
- ☑ Climate Change
- ☑ Plants and Animals
- ☑ Marine Species, Fish, or Fisheries
- ☑ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

THE IMPACT OF COAL IS MUCH BROADER THAN THE MILLENIUM BULK TERMINAL IN LONGVIEW. NEGATIVE IMPACTS ALONG THE ENTIRE COAL ROUTE THROUGH WASHINGTON NEED TO BE PROPERLY & THOROUGHLY ADDRESSED. TODAY, AT MUCH LOWER TRANSPORT LEVELS, COAL DUST & DIESEL EXHAUST IS BEING RELEASED INTO THE AIR, OUR BODIES AND THE ENVIRONMEN AT UNACCEPTABLE LEVELS. INCREASING COAL TRANSPORT TO THE LEVELS SUGGESTED BY MILLENIUM WILL HAVE

(additional space is provided on the back)

(comment continued)

A DETRIMENTAL EFFECT ON THE QUALITY OF LIFE, HEALTH AND ECONOMY OF A GREAT NUMBER OF WASHINGTON RESIDENTS AND PARTICULARLY THOSE ALONG THE COAL TRANSPORT ROUTE. COAL DUST RELEASE AND THE RESULTING DUSTING ON OUR HOMES AND PROPERTIES IS ALREADY HARMFUL.

~~THE EFFECT ON RESIDENTS~~

MANY WHO WILL BE HARMED ALONG THE COAL ROUTE WILL SERIOUSLY BE EFFECTED, BUT NONE WILL RECEIVE ANY BENEFIT WHAT SO EVER. THE COMMUNITIES AND RESIDENTS ALONG THE COAL ROUTE NEED TO BE PROTECTED AND RECEIVE MAXIMUM CONSIDERATION WHEN EVALUATING THE ENVIRONMENTAL IMPACTS. THESE IMPACTS CANNOT BE MITIGATED AND THE FINANCIAL INTERESTS OF THE FEW TO GAIN MUST NOT BE ALLOWED TO OVERSHADOW THE GREAT HARM RESULTING FROM THE PROPOSAL FROM MILLENNIUM.

BILL MONTGOMERY
13816 SE 35TH ST.
VANCOUVER, WA 98683

Submission Number: ***MBTL-SEPA-DEIS-0003201***

Received: 6/13/2016 6:29:55 PM
Commenter: Marilyn Montgomery
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Toni Montgomery
13816 SE 35th St.
Vancouver, WA 98683
360-891-6136

RE: Draft EIS

Dear Committee,

The report does not represent the entire route coal trains take within the Washington State borders. It totally disregards the citizens affected by the coal dust coming off the coal trains. This report is flawed and should be completed to include the entire Washington route.

My health and my property have suffered because of these long and contaminating coal trains. I am now on a daily inhaler and a rescue inhaler because I am only using 60% of my lung capacity. My allergies have increased and the only difference in my life are coal trains. Coal dust is the only explanation for this change in my breathing.

Coal dust has smothered plants in my yard killing a tree. It coats the leaves of my plants. This is what Washington State residents along the coal train route breathe everyday.

Surfactants do not work. Spraying a second time will not make a difference as the vibration of the train on the tracks causes the surfactant to be chipped off. Please do not be fooled by the promise of surfactant use to stop coal dust. It is not true.

This study should have included the dangers of coal dust exposure to the public. Coal trains pass homes, schools, business and agriculture. The total lack of recognition of the dangers to the public is unacceptable.

The people of Washington State deserve a complete study. Please serve the community instead of the declining coal industry.

I personally feel completely disrespected due to the lack of consideration for the miles that these coal trains travel eventually passing my home leaving coal dust behind coating everything.

Washington State residents will not allow this report to stand as it does not represent the damage that these coal trains have already done or examined the future damage yet to be caused.

Submission Number: ***TRANS-LV-M1-00025***

Received: 5/24/2016 12:00:00 AM
Commenter: Toni Montgomery
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Toni Montgomery. I live in Vancouver, Washington. The EIS report does not represent the entire route coal trains take within the Washington state border. It totally disregards the citizens affected by the coal dust coming off the coal trains. This report is flawed and should be completed to include the same Washington route. My health and my property have suffered because of these long and contaminating coal trains. I am now on a daily inhaler and a rescue inhaler because I am only using 60 percent of my lungs. My allergies have increased and the only difference in my life are coal trains. Coal dust is the only explanation for this change in my breathing. Coal dust has smothered plants and is killing a tree. It coats the leaves of my plants. This is what Washington state residents along the coal train route breathe every day. Surfactants do not work. Spraying a second time will not make a difference. As the vibration of the train on the tracks causes the surfactant to be chipped off. Please do not be fooled by the promise of surfactant use to stop coal dust. It's not true. This study should have included the dangers of coal dust exposure to the public. Coal trains pass homes, schools, businesses and agriculture. The total of the recognition of the dangers to the public is unacceptable. The people of Washington state deserve a complete study. Please serve the community instead of the declining coal industry. I personally feel completely disrespected due to the lack of consideration for the miles that these coal trains travel, eventually passing my home, leaving coal dust behind, covering everything. Washington state residents will not allow this report to stand as it does not represent the damage that these coal trains have already done or examined the future damage yet to be caused. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001299***

Received: 5/26/2016 6:49:56 PM
Commenter: Vicki Montgomery
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Despite all the rhetoric to the contrary about coal exports, I firmly believe you can have both good family-wage jobs and be good stewards of the environment. It doesn't have to be a choice of one over the other. I support Millennium Bulk Terminals site in Cowlitz County. These trains are no different than the coal cars we've transported through our state for many decades. In reality, not one ton more of coal will be used globally because of U.S. exports, and the net gain in greenhouse gas emissions is insignificant. If we don't build these terminals, energy suppliers will just look elsewhere for their supply! Thanks for the ability to comment. I believe the final environmental review needs to be released ASAP!

Submission Number: ***MBTL-SEPA-DEIS-0002807***

Received: 6/13/2016 2:31:53 PM
Commenter: Bill Moomau
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
As you know exports are very important to Washington State and facilities like this will position us for trade with many partners, particularly if the Trans Pacific Pact is approved with additional Asian customers.

Submission Number: ***MBTL-SEPA-DEIS-0001641***

Received: 5/31/2016 6:10:42 PM
Commenter: Conley Moon
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. I appreciate you considering this feedback.

Submission Number: ***MBTL-SEPA-DEIS-0002054***

Received: 6/7/2016 11:08:37 AM
Commenter: Stan Moon
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Shipping 44 million metric tons annually of coal that is to dirty to be burned in the US is irresponsible and unacceptable. The increase in pollution and atmospheric carbon dioxide caused by burning this coal is a negative environmental impact that is not acceptable and is not addressed in the EIS. This impact will be worldwide and should be adequate reason to reject this proposal. A bulk terminal to export pollutants should be outlawed. This is ecologically unsustainable, has no benefit to the general public and is not worth the jobs it will create.

Submission Number: ***MBTL-SEPA-DEIS-0002661***

Received: 6/13/2016 12:31:10 PM
Commenter: Wendy Mooney
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001891***

Received: 6/3/2016 12:26:16 AM
Commenter: Amanda Moore
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please consider the NO ACTION choice for the proposed Millenium Bulk Terminal in Longview, WA. Small towns in the Pacific Northwest are being exploited, not supported, by the fuel industry's last land-grabs for export routes and processing facilities. We have no more time to support a destructive and dying industry when our leaders are pledging to increase emissions controls and alternative methods for energy in order to adhere to proposed levels by 2050. Please support the working peoples of the Pacific Northwest, and from the origin states and regions, who know that this proposal is not about "jobs" and community growth; it is about obscuring the risks: to our health, to the fish's health, and to the overall health and vitality of our fantastic workhorse, the Columbia River. Please protect the river from this development. I live about 4 blocks above the tracks; my kids play at the park that runs adjacent to where these trains would run. There are so many reasons why this project should be halted. Please stand with the voice of the people from Canada to the sea: No Coal Trains. It is a harmful and dangerous venture, serving a notoriously shady industry. Please protect our river. Be well, and be strong. Say NO. Thank you, Amanda G Moore

Submission Number: ***TRANS-PASCO-M1-00024***

Received: 6/2/2016 12:00:00 AM
Commenter: Curtis Moore
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Curtis Moore (phonetic). I live near Pasco, Washington. It appears that climate change seems to be the fundamental issue that is involved. Climate change has happened forever and will continue to happen. Evidence of climate change, climate warming is widely available. It is factual the link of it's being caused by mankind has not been factually established. The promoters of the theory depends on opinion to hopefully establish a link. If scientific evidence was available, they would be all over it all of the time. All they have is the opinions of a number of people that it might be a problem.

I support the terminal. I think that the financial aspects of it are very important. I have a master's of science in financial services, and I think the people that would be helped by this terminal would be far more important than any theoretical damage that might be done to the climate.

Thank you.

Moore, D. (3608)

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact St...

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☐ Greenhouse Gas
- ☐ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

I was impressed with the whole process.. Even tho I'm old & wear a hearing aid I was able to hear & also read the comments being made by the speaker I love Longview & moved here 3 yrs ago. I lived in Camp Verde, Ariz for 30 years before I moved here.
The meeting was very well run & I learned a lot from the speakers.
Im against coal trains going thru our town

D. Moore
Longview

(comment continued)

(additional space is provided on the b

Submission Number: ***TRANS-PASCO-M1-00016***

Received: 6/2/2016 12:00:00 AM
Commenter: Fred Moore
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Hello, my name is Fred Moore (phonetic). I'm a resident here in Pasco. And I would like to say to you I have feelings on both sides of the issue. I don't like coal dust, but I also like hot showers. I like telephones. Everything is a trade off. Some things are worth trading. So I'm coming down on the side of this the fact that many people I have run across need work. They're devastated without it. And I come down on the side of this whole project right here. This coal project.

Submission Number: ***MBTL-SEPA-DEIS-0000731***

Received: 5/23/2016 1:31:13 PM
Commenter: James Moore
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001216***

Received: 5/26/2016 5:58:53 PM
Commenter: Jess Moore
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium's proposal is unprecedented and has far reaching economic implications. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0001543***

Received: 5/31/2016 4:59:39 PM
Commenter: John Moore
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to submit my comments regarding Millennium Bulk Terminals proposed port at Longview. I fully support this project. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State's role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. There might not be many who know how much coal is used in everyday occurrences, but for those who do, know Millennium's project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both. Thanks for reading my comments.

Moore, Michael (0989)

Submission Number: ***MBTL-SEPA-DEIS-0000989***

Received: 5/24/2016 5:52:08 PM
Commenter: Michael Moore
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Please commit to a timetable for the issuance of a final EIS. Ecology's SEPA Rules require a final EIS to be issued as close as possible

Submission Number: ***MBTL-SEPA-DEIS-0001795***

Received: 6/2/2016 5:11:46 PM
Commenter: richard moore
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for this opportunity to voice my support of Millennium Bulk Terminals - Longview project. This port will benefit the economy of the region, and that of the nation. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium's proposal. Now that the rail corridor has been studied, now it's time for progress on the Millennium project! We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage?

Submission Number: ***TRANS-PASCO-M2-00043***

Received: 6/2/2016 12:00:00 AM
Commenter: Richard Moore
Organization: BNSF
State: Virginia

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening. My name is Richard Moore. I'm from Virginia. I work for BNSF. I was a merchant marine, I worked for Exxon Mobil for ten years on oil tankers, so this is something I know.

We have a lot of people that oppose the crude oil ships, things of that sort. You go out to the parking lot and they get into a lumber truck or a big SUV and, you know, at the railroad right now, we have 4,500 employees furloughed, laid off due to the volume of coal trains that has dropped off. Me myself, I'm about ten people from being one of those employees being laid off. I think it's a good thing. It will create jobs.

Also comments were made about the amount of coal dust coming off the trains. Well, the trains run metal to metal so the amount of coal dust that's coming off, we wouldn't be able to run trains because of that. We do air testing constantly in the Pasco yard.

I just think it's a good thing for this thing to go through to create jobs and hopefully bring some of my colleagues back to work. It's kind of hard to go home when you've got four kids and tell them, hey, dad doesn't have a job because, you know, coal trains aren't running anywhere. That's all I have. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0001292***

Received: 5/26/2016 6:45:02 PM
Commenter: Robert Moore
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. Washington is highly dependent on trade, and Cowlitz County desperately needs family wage jobs. An EIS that includes newly-invented forms of navel gazing should not have been necessary for a transportation infrastructure project that will facilitate foreign trade and create good jobs for our community. We need this project to move forward without further delays or unprecedented permit conditions. Please do not delay the permitting process any further. It is important to get people back to work. There are good jobs on the line and waiting on your review.

Submission Number: ***MBTL-SEPA-DEIS-0001463***

Received: 5/30/2016 5:28:48 PM
Commenter: Shawn Moore
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As a resident of Sagle Idaho I am opposed to the Millennium Bulk Terminals-Longview project. The increased railway traffic through our community will substantially increase the railway traffic through our neighborhood, and decrease our current property values. Also the amount of exposure to additional coal dust from those trains is putting my two little girls at risk for respiratory issues since we live adjacent to those tracks. I am extremely opposed to the project as the town of Sagle and Sandpoint will be negatively impacted by health issues, increased railway noise, traffic delays, and decreased property values as a result of this proposed project..! Thank you, Shawn Moore, Sagle Idaho

Submission Number: ***MBTL-SEPA-DEIS-0000899***

Received: 5/24/2016 5:02:09 PM
Commenter: Robert Morgan
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Millennium Bulk Terminals will bring jobs and stability to Cowlitz County. Export projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let’s be clear â€" the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. I appreciate the agencies’ hard work on reviewing this project. Please don’t let it get bogged down in an expanded scope of review. This old industrial site needs a new life.

Submission Number: ***MBTL-SEPA-DEIS-0000391***

Received: 5/17/2016 3:14:57 PM
Commenter: Steven Morgan
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

This is specific to Bonner County,Idaho. The Railroad could perhaps voluntarily look at the impact resulting from the increased traffic and see if they can reduce some of the more negative factors. The massive tree cutting that followed the big wind storms 2 years ago was not only unsightly, but it seems to have allowed much of the noise of the passing trains to travel further than before they cut. Seems to me that it might be reasonable to seek voluntary re-plantings, designed and planted in such a way as to screen the rail lines and disperse or deflect some of the noise. That couldn't be too expensive and makes for better neighbors. Even new highways are building sound barrier type fencing in strategic areas to ameliorate the noise of passing traffic. Maybe the City of Sandpoint and Bonner County can seek federal grants to help pay for this since we are burdened with this public good for interstate commerce? If not voluntary by BNSF then perhaps regulatory requirements are in order that protect interstate commerce, but that also protect the rights and enjoyment of those directly impacted by such increased traffic.

Submission Number: ***TRANS-LV-Q1-00003***

Received: 5/24/2016 12:00:00 AM
Commenter: Tess Morgan
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Tess Morgan. I appreciate this opportunity. I speak for myself as a citizen, constituent, registered voter, and native Washingtonian.

This proposal, I believe, is not reasonable, sound, or affordable.

My second point is Longview cannot outlive or afford this proposal. The chemicals from this terminal are going to cause cancer for our people. It is going to cause traffic in town that will exceed capacity. Children will develop asthma and health problems that are preventable from the coal dust in their lungs.

The cost of the potential loss of the Columbia River and the long-term health effect and wellbeing of citizens here and globally are more relevant and valuable than the short-term gain of these international petroleum and oil industry companies.

Please do what is right, moral, and ethical to protect the legacy of Longview families and our community as stewards. Please deny this proposal. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000756***

Received: 5/23/2016 2:01:58 PM
Commenter: William Morgan
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. When the trains are loaded in Montana, Millennium puts a liquid cover like a glue on top of the cars. This eliminates a lot of the coal dust that would normally come off of train cars. Millennium is building this world class export facility right! Remember what matters and keep the focus local! This DEIS is being finely crafted. The progress this port represents should not be hampered. It's time to get folks back to work!

Submission Number: ***MBTL-SEPA-DEIS-0001391***

Received: 5/26/2016 7:39:23 PM
Commenter: William Morgareidge
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The Department of Ecology should speedily complete the permitting for Millennium Bulk Terminals. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0000978***

Received: 5/24/2016 5:45:32 PM
Commenter: M Moriarty
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. Media coverage would have us believe that transporting coal by rail through our state is unprecedented, it’s not. We’ve transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. Now's the time to utilize trade infrastructure. The Millennium Bulk Terminals project is one step closer to being able to participate in this vital business. Thanks to the agencies for considering my comments.

Submission Number: ***MBTL-SEPA-DEIS-0003219***

Received: 6/13/2016 6:45:30 PM
Commenter: Barbara Morkill
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing this is opposition to the millennium bulk terminal proposal. As witnessed this past week derailments are a likely occurrence. Coal losses amount to 500 lbs of coal per car per trip. This can coat the track making it slippery for the other passing trains such as those carrying the highly flammable crude oil. As a resident of Spokane the tracks pass through downtown, near our hospitals schools and government buildings. Any derailment downtown could make even getting to the hospital impossible. Spokane gains no jobs. We suffer only diminished air quality, noise,traffic and the possibility of irrepatable damage to commerence and lives should an accident occur. We are putting our health at risk damage to our rivers and sole source of drinking water for what? Selling our energy to foreign companies. Big international companies gain and Washington state and the rest of the country loose. Our community does not have the resources to build better tracks or fight a catastrophic fire. This is a bad deal for western states. Our communities need to concentrate on improving the lives of its citizens not put all in harms way. Say No to this project.

Submission Number: ***MBTL-SEPA-DEIS-0000291***

Received: 5/10/2016 7:10:12 PM
Commenter: Dennis Morr
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. Raising a family is tough, and this economy is not making it any easier. That's why we need to capitalize on any opportunity that we have to provide good-paying jobs that can support a family. The Millennium Bulk Terminal project will create jobs that can help families give their children the head-start that they need. There are men and women throughout the state that are waiting for the chance to work hard for their families. It simply makes no sense to turn them away at this point. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0001208***

Received: 5/26/2016 2:13:11 PM
Commenter: David Morris
Organization: University of Montana
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I strongly oppose the building and the operation of this coal transshipment facility. It would exacerbate global climate change, have unacceptable local impacts on health and safety (coal dust and delayed emergency response) and do little to further prosperity in the U.S. The funds set to build this facility should be used to advance renewable energy production and transmission instead.

Submission Number: ***TRANS-SPOKANE-M1-00077***

Received: 5/26/2016 12:00:00 AM
Commenter: Laura Morris
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm Laura Morris. I'm a semi-retired teacher presently living in Missoula, Montana.

I'm not unappreciative of the hard work that people in the coal industry have done to keep our homes warm and businesses operating but education has taught me that continued use of fossil fuels is not without heavy cost.

These costs include risk to our health, to wildlife, including disappearance of species, and to agriculture due to toxins and extraction and burning fossil fuels add to our air, soil, and water as well as the changes they cause in our climate.

I grew up in an America where we could be proud that our country was the leader in innovation that brought great inventions, comforts, and conveniences to our life, but at the same time we have a need to be aware of mistakes along the way. We must understand that when we are overambitiously exploiting Earth's resources, we endanger life on this planet.

I don't understand an attitude of hanging onto the traditional such as coal burning while people around the globe are researching safer and better means of energy production which promises an abundance of jobs.

They do this noise that old traditional means have been proven by the vast majority of our scientists in peer-review studies to cause devastation here and now and to continue on this path means greater devastation for up and coming generations.

Submission Number: ***MBTL-SEPA-DEIS-0001071***

Received: 5/24/2016 6:54:05 PM
Commenter: Carsten Mortensen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn't have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life.

Submission Number: ***MBTL-SEPA-DEIS-0000750***

Received: 5/23/2016 1:56:34 PM
Commenter: Frances Moses
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium's proposal is unprecedented and has far reaching economic implications. Thank you for your consideration. I look forward to seeing this project come to reality.

Submission Number: ***MBTL-SEPA-DEIS-0001792***

Received: 6/2/2016 5:09:27 PM
Commenter: Val Moskalenko
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the opportunity to weigh in on this development project in Longview. Media coverage would have us believe that transporting coal by rail through our state is unprecedented, it's not. We've transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. I appreciate you considering this feedback.

Moss, Jessica (0089)

Submission Number: ***MBTL-SEPA-DEIS-0000089***

Received: 5/5/2016 9:28:48 PM
Commenter: Jessica Moss
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0000167***

Received: 5/9/2016 2:14:16 PM
Commenter: Scott Most
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. MBT has received a thorough and comprehensive draft EIS reviewâ€"one five years in the making. If we don’t take the next step forward and turn this vision into a reality, it’s going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0002632***

Received: 6/13/2016 11:51:37 AM
Commenter: Darla Mouat
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I support this marine terminal.

Submission Number: ***MBTL-SEPA-DEIS-0000791***

Received: 5/23/2016 4:35:39 PM
Commenter: Stephanie Moue
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm glad to have the chance to make a comment about this project as it's very important to me. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and should be treated as such. An environmental review of this time and scope should not have been needed to redevelop an old smelter site. The Draft EIS is sufficient, it's time to move forward. Thank you for letting me submit my opinions and show my support for the project. Sincerely, Stephanie Moue
stephaniemoue13@gmail.com 98632

Submission Number: ***MBTL-SEPA-DEIS-0001462***

Received: 5/30/2016 4:47:25 PM
Commenter: Aurelie Moulin
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

This coal terminal is against the Paris Climate agreement and against legitimate claims to step away from carbon emissions to favor cleaner energy sources. This new terminal would provide yet more excuses not to act in favor of cleaner energy. The money invested in this new terminal could be invested in alternative energies instead, and actually show the PNW commitment to lead the nation by example.

Submission Number: ***MBTL-SEPA-DEIS-0001900***

Received: 6/3/2016 3:54:18 PM
Commenter: C Moulton
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

No more money should be spent for infrastructure in the direction of using coal as an energy source. Global warming has become a major concern for all thinking people. To ignore it in the face of current conditions requires a person to entirely ignore massive scientific evidence. Funds should be directed toward less carbon intensive methods of producing energy including federal subsidies toward solar, wind, biogas, and etc but certainly not coal.

Submission Number: ***MBTL-SEPA-DEIS-0002582***

Received: 6/13/2016 8:39:38 AM
Commenter: Paul Moyer
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to join others in expressing my opposition to the proposed Millennium Bulk Coal Terminal in Longview, WA. My name is Paul Moyer. I live in White Salmon, Washington. I retired last year as a Physician Assistant having worked since 1995 in Community Health Centers offering Primary Medical Care to residents of Yakima, Klickitat and Skamania counties of Washington, and Hood River and Wasco counties of Oregon Human generated greenhouse gas emissions from the burning of coal and oil derived fuels contribute directly to Climate Change. And Climate Change is NOW, occurring here, TODAY!! Washington State's Department of Health's role for Climate Change reads as follows: "Climate change is a global environmental and public health threat. In Washington, our economy and quality of life are very connected to our natural resources, increasing the consequences of climate-change impacts. (In order) "to reduce the severity of climate change, we must rapidly reduce gases that trap heat in the environment and the use of fossil fuels." As you know, and as others have aptly pointed out the Millennium Bulk Coal Terminal- DEIS describes multiple direct and indirect threats to the well-being of people, habitats and ultimately, the biosphere. The DEIS notes that the greenhouse gas emissions from the terminal could be equivalent to five coal-fired power plants. Coal dust and diesel emissions from coal trains pose major health risks to people in communities throughout our region, especially impacting those living and working closest to these carbon compounds. The organization, Physicians for Social Responsibility (PSR) succinctly lists the following direct human health effects related to coal exports: Diesel particulate matter is associated with: • impaired pulmonary development in adolescents; • increased cardiopulmonary mortality and all-cause mortality; • measurable pulmonary inflammation; • increased severity and frequency of asthma attacks, ER visits, and hospital admissions in children; • increased rates of myocardial infarction (heart attack) in adults; • increased risk of cancer; • neuro-developmental disorders. Coal dust is associated with: • chronic bronchitis; • emphysema; • pulmonary fibrosis (pneumoconiosis); • environmental contamination through the leaching of toxic heavy metals. Exporting up to 44 million tons of coal each year from the mouth of the Columbia River to burn in Asia, utilizing up to 16 additional trains per day will cause an appreciable increase in human and environmental health risks and worldwide climate disturbance. For these reasons, and others I oppose the Millennium Bulk Coal Terminal proposed for Longview, WA. EARTH and its inhabitants are NOT Expendable!!

Submission Number: ***MBTL-SEPA-DEIS-0001089***

Received: 5/24/2016 7:14:28 PM
Commenter: M. Mucci
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. MBT has received a thorough and comprehensive draft EIS reviewâ€"one five years in the making. If we don’t take the next step forward and turn this vision into a reality, it’s going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays.

Submission Number: ***MBTL-SEPA-DEIS-0003388***

Received: 6/14/2016 12:42:00 AM
Commenter: R.Joris and Marilynne Mueller
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

We are writing in opposition to the coal industries plan to transport dirty coal through our communities and along our precious waterways to a proposed coal export terminal at Longview, WA. We do not feel adequate attention was given in DEIS to coal dust and chunk contamination of water and land along the rail route and especially at the port in Longview. Other coal export terminals have had a huge problem containing coal dust and contamination of the water is unavoidable. We do not want coal with it's contaminants in our Columbia River! The sediment in the river would be contaminated with toxic Mercury which is known to bioaccumulate in fish. We have spent millions in Washington trying to recover our salmon in the Columbia River and do not want them or our fisheries harmed. Then there is the matter of increased traffic on the river which would have a negative effect on tribal, sports and commercial fishers. The DEIS dismisses the impact as low (accidents). Well, what about the well being of these industries? We already have a problem with long coal and oil trains here in Spokane which we live near. During heavy traffic times these trains really cause a mess. Also coal trains have priority we are told and our agricultural products have to wait when we have an overloaded system. Who will have to bear the cost of improving the system? With increased traffic the DEIS predicted that we will have an increased risk of accidents. There was already a serious oil train derailment 10 days ago on the Columbia River. Who pays to clean these accidents up? Increased traffic means increased diesel particulates which are associated with many health problems—especially people who have pulmonary and asthma problems. That will be especially troublesome in Spokane where we have an air inversion situation at times that would make the situation more dangerous. Who bears the burden of these added health care costs? We want jobs that do not pollute our air. We also feel this is a risky investment since demand abroad has declined dramatically, 25% in 2015 and projected 20% in 2016. (Moody's Lights Go Dark on Coal, May, 2016). "If the terminals were already built and in operation, few, if any would be exporting coal as current pricing wouldn't support it." Reported in S&P Global, Oct 2015. So the DEIS projection of using 2013 coal prices is too high. Private investment is disappearing and coal companies are going bust. Since many coal companies have been allowed to be self-bonding many projects have been left in a disastrous state, and taxpayers have to clean up the mess. So mitigation suggested by DEIS should not be covered by self-bonding! Coal companies have been unreliable in their monitoring and control of coal dust. A fine can often be a small price to pay, so strong enforcement standards are necessary to protect the community. Allowing a risky business to be permitted that could leave us with an environmental disaster is unacceptable. Most importantly it is our belief that we are called to be good stewards of our earth –its land, water and air—and of our communities. Building this coal terminal so that coal can be shipped to Asia, burned, and the emissions and pollutants contaminating the land, water and air of this earth we live on, acidifying the ocean, destroying life and eco-systems, changing weather, etc, etc—it is plainly not being a good steward. As you said in the DEIS, emissions are cumulative and the greenhouse gases presently in the atmosphere are already causing problems. We do not want more dirty fossil fuel emissions! As for jobs, there are already twice as many jobs in solar and wind power than the entire coal industry. Our children deserve a better world than the one this project would give them. Sincerely, Dr. R. Joris Mueller and Marilynne Mueller

Submission Number: ***MBTL-SEPA-DEIS-0003363***

Received: 6/13/2016 10:39:05 PM
Commenter: Janey Muller
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Family wage jobs are needed in Washington!! This project will provide that and protect the environment at the same time. We have proven that as a state we are masters at protecting our beautiful state, and at the same time construct amazing bridges with little impact to lakes waterways. Don't let feel-good politics come at the expense of family wage jobs at a time when they are sorely needed in this state. Not everyone is a tech-worker, and believe it, some people want to be in the trades where the wages are high enough to support a family of 4or 5 and, be in a beautiful place like Longview. It's time to put southwest washington to work people!!

Submission Number: ***MBTL-SEPA-DEIS-0003054***

Received: 6/13/2016 5:07:35 PM
Commenter: Dick Mullinax
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our state is trade dependent and a critical part of the import/export infrastructure of the West coast. International trade is essential to the economy of Washington and supports many family-wage jobs. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible. Sincerely, Dick MULLINAX Dickjoym@gmail.com 98684

Muma, Michael (0432)

Submission Number: ***MBTL-SEPA-DEIS-0000432***

Received: 5/17/2016 6:53:32 PM
Commenter: Michael Muma
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium’s proposal is unprecedented and has far reaching economic implications. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Mundy, Tyson (0804)

Submission Number: ***MBTL-SEPA-DEIS-0000804***

Received: 5/23/2016 5:00:33 PM
Commenter: Tyson Mundy
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to state my opinions on this important issue. Raising a family is tough, and this economy is not making it any easier. That's why we need to capitalize on any opportunity that we have to provide good-paying jobs that can support a family. The Millennium Bulk Terminal project will create jobs that can help families give their children the head-start that they need. There are men and women throughout the state that are waiting for the chance to work hard for their families. It simply makes no sense to turn them away at this point. This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible. Sincerely, Tyson Mundy tmundy@jhkelly.com

Submission Number: ***TRANS-LV-M1-00063***

Received: 5/24/2016 12:00:00 AM
Commenter: Harry Munky
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Harry Munky (phonetic). I'm speaking for Longview and Kelso. I live here. It's hard to find jobs here and we need these jobs, because they always turn other companies down. Now this is 2016. It's a change now. It's a change to get more jobs. Maybe it's more economic, more invested in road to be fixed and passing on to our new, young generation. Because I've been here, this is a small town. You guys don't live here. It's hard to get a job. I don't want to travel so far to get a job. We need to increase our pay rates, our economy. Our growth is going up. And now it's like we're struggling. We're struggling every day. And I don't have a job. I'm still looking for a job. I welcome this company to come over here. We meed a good job here in Kelso and Longview. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002979***

Received: 6/13/2016 3:51:57 PM
Commenter: Ryan Munn
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000601***

Received: 5/19/2016 6:54:53 PM
Commenter: David Murphy
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the opportunity to weigh in on this development project in Longview. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. I appreciate you considering this feedback.

Submission Number: ***MBTL-SEPA-DEIS-0001751***

Received: 6/2/2016 12:41:00 PM
Commenter: Donna Murphy
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm Donna Murphy, from Portland, and a retired Portland Public School teacher. I'm responding to the Environmental Impact Statement for the proposed Millennium/Arch Coal terminal in Longview, Washington. I'll focus on the issue of coal dust slipping off the proposed uncovered rail cars shipping 44 million tons of coal a year through Idaho, Washington, and Oregon. Many organisms would be affected by a total of 120 tons of coal dust each day falling on plants, animals, and sea creatures along the route and out to sea — with Longview tidal currents that could be as much as 56 miles. Coal dust effects on living matter is well-documented. It smothers plant and animal life all along its perilous way. It lessens organism's ability to photosynthesize by cutting off sunlight. It smothers and asphyxiates breathing in animals and humans, and scrapes away protective layers from fish and plants. I think of it as Black Lung Disease, which killed my grandfather, except this time it's not only in humans. Surfactants applied to lessen the problem of coal dust actually enable coal pollutants to more easily spread. Coal that was once safe inside the earth now is let loose in the air, on plants and the soil, and into our precious waterways, making lethal contact with our already endangered small supplies of once plentiful sea life like crab and oysters and salmon. We lose jobs and vital ecosystems. After hearing from the DEIS Statement that this project has significant and unavoidable impacts, I kept wondering, "Why are we all even talking about this?" But I know — it's for the benefit of a very few, in this case the bankrupt Arch Coal. Your agency is the front line of our defense against that interest of profit wanting to use our precious earth as a commodity to be bought, sold, and destroyed. I am asking you to please hold the line, to protect our earth, and to say no to this coal proposal.

I'm Donna Murphy, from Portland, and a retired Portland Public School teacher. I'm responding to the Environmental Impact Statement for the proposed Millennium/Arch Coal terminal in Longview, Washington.

I'll focus on the issue of coal dust slipping off the proposed uncovered rail cars shipping 44 million tons of coal a year through Idaho, Washington, and Oregon.

Many organisms would be affected by a total of 120 tons of coal dust each day falling on plants, animals, and sea creatures along the route and out to sea — with Longview tidal currents that could be as much as 56 miles.

Coal dust effects on living matter is well-documented. It smothers plant and animal life all along its perilous way. It lessens organism's ability to photosynthesize by cutting off sunlight. It smothers and asphyxiates breathing in animals and humans, and scrapes away protective layers from fish and plants. I think of it as Black Lung Disease, which killed my grandfather, except this time it's not only in humans.

Surfactants applied to lessen the problem of coal dust actually enable coal pollutants to more easily spread. Coal that was once safe inside the earth now is let loose in the air, on plants and the soil, and into our precious waterways, making lethal contact with our already endangered small supplies of once plentiful sea life like crab and oysters and salmon. We lose jobs and vital ecosystems.

2 –

After hearing from the DEIS Statement that this project has significant and unavoidable impacts, I kept wondering, "Why are we all even talking about this?" But I know — it's for the benefit of a very few, in this case the bankrupt Arch Coal. Your agency is the front line of our defense against that interest of profit wanting to use our precious earth as a commodity to be bought, sold, and destroyed. I am asking you to please hold the line, to protect our earth, and to say no to this coal proposal.

Donna Murphy
2134 NE 37 ave
Portland OR 97212

Submission Number: ***MBTL-SEPA-DEIS-0002349***

Received: 6/9/2016 5:35:35 PM
Commenter: JANICE MURPHY
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on the DEIS of the proposed Cowlitz County coal export terminal. This is an excellent project and one that will bring broad-ranging economic benefits to Washington and to the national economic outlook for years to come. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium’s proposal. Now that the rail corridor has been studied, now it’s time for progress on the Millennium project! Cowlitz County is fraught with uncertainty. Millennium’s proposal, however, offers all the economic benefits of a long-term port facility without any of the uncertainty. Coal is needed by other countries to help shape their future and enhance their quality of life. Let's give other countries the living standards we have for ourselves.

Submission Number: ***MBTL-SEPA-DEIS-0002516***

Received: 6/10/2016 8:40:39 PM
Commenter: Naomi Murphy
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It is past time to deny the Millennium Bulk Terminal. “China imported l.7 million tons of U.S. Coal in 2014, but only 229,00 tons in 2015, a reduction of 86.5 percent.” (Sierra Magazine, May/June 2016) With the Chinese market decreasing, there is no reason to continue with this project. Aside from the overall collapse of the coal industry, we need to cut, not increase our consumption of fossil fuels. Increased coal and /or oil train traffic increases the risks to our rivers and causes disruption of the communities along the rail lines. We need to seek a transition away from dirty energy if we are to try to reverse the effects of climate change. Please deny the permit for the Millennium Bulk Terminal in Longview.

Submission Number: ***MBTL-SEPA-DEIS-0001790***

Received: 6/2/2016 5:07:58 PM
Commenter: Robyn Murphy
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Millennium Bulk Terminals will bring jobs and stability to Cowlitz County. Export projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen. What most folks in Seattle tend to forget is that not everyone in Washington lives in Puget Sound. Not all of us work in the high-tech industry, and we still earn good livings as farmers, working at ports or in manufacturing. We make things, harvest and develop natural resources, feed our community and help facilitate trade in our great state. And we need more jobs like this â€" especially in Cowlitz County where our unemployment rate is 8 percent. Millennium Bulk Terminals can bring great jobs to our county â€" not to mention the much-needed tax revenues. Let’s not forget about how much time, effort and money Millennium has spent to clean up the port. Frankly, it was an environmental blight on our community, but now it will be a critical link for expanding trade for Southwest Washington. Again, having good jobs and protecting the environment can go hand in hand. When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002574***

Received: 6/13/2016 1:38:05 AM
Commenter: Roger Murphy
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I, and many others, are concerned about increasing carbon emissions. Science has shown us that these emissions are contributing to climate change. Why then, should we encourage coal export to Asia where its utilization will only increase the worlds CO2 levels. These levels then lead to an increased acidifying affect in the oceans and this has been shown to be detrimental to the health and well being of this country. Thus our export will come back to harm our environment. Which leads to the question "Why export coal?"

Submission Number: ***MBTL-SEPA-DEIS-0003236***

Received: 6/13/2016 7:04:27 PM
Commenter: Ethan Murray
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it’s time to move forward. We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage?

Submission Number: ***MBTL-SEPA-DEIS-0000694***

Received: 5/23/2016 12:40:23 PM
Commenter: Sean Murray
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the opportunity to add my voice to that of others in supporting the environmental study for the proposed port at Longview. The DEIS will present a clear picture of how Millennium Bulk Terminals will proceed in opening and operating this port and the economic, environmental, and social benefits of this project are deserving of approval. Millennium has helped clean up the old Reynolds facility and the Columbia River. The old industrial site had degraded water quality and fish habitats on the river. Millennium has completely turned this around. Millennium has demonstrated a commitment to do everything in its power to contribute to the well-being of the community and local environment. If you ask people in Longview what they think of Millennium, they will tell you they are a good neighbor, good employer and responsible steward of our environment. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0000388***

Received: 5/17/2016 12:44:11 PM
Commenter: Ann and Alan Musche and Richards
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

May 17, 2016 We strongly object to any coal terminal in Cowlitz county. We object on health, environmental, and economic grounds. To think that anyone here would be willing to sacrifice the livelihoods of thousands of us for the sake of 135 jobs is ludicrous. Most of these jobs would be taken by people who moved from larger urban areas in any case. Thousands of jobs here in fishing and tourism industries, and many others as well, would be endangered. Thousands of people would have their health endangered: we would all have to breathe the coal dust brought here from Montana & Wyoming, all for the sake of industrialist fat cats from Australia, whatever new name they come up with for their greedy company. AND THEN: this coal would be burned in China or elsewhere in Asia, and the fumes and poisonous gases, that were not already deposited on the west side of the Pacific, would be blown back to us here in North America, as final payment for the greed of the industrialists already mentioned. A Bad Deal for everyone except the Greedy Few. Vote NO on coal passage through our area -- show some common sense and awareness of finite environmental capacity!

myers, coralynn (0980)

Submission Number: ***MBTL-SEPA-DEIS-0000980***

Received: 5/24/2016 5:46:26 PM
Commenter: coralynn myers
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it’s time to move forward. I’m certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

From: Butorac, Diane (ECY) <dbut461@ECY.WA.GOV>
Sent: Monday, June 06, 2016 4:20 PM
To: Pace, Erin
Subject: FW: MBTL Comment

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Orange Category

-----Original Message-----
From: Jill Myers [mailto:jilllmyers@yahoo.com]
Sent: Friday, June 03, 2016 10:14 AM
To: Butorac, Diane (ECY) <dbut461@ECY.WA.GOV>
Subject: MBTL

Hello Ms. Butorac,

I wanted to state my support for the MBTL project. I feel it has great potential for positive economic impact.

Thank you,
Jill Myers

Submission Number: ***MBTL-SEPA-DEIS-0001374***

Received: 5/26/2016 7:25:25 PM
Commenter: Todd Myers
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

This is a great use of an old industrial site. We need more companies willing to clean up and utilize brownfield sites. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. I appreciate you considering this feedback.

Submission Number: ***TRANS-SPOKANE-M1-00064***

Received: 5/26/2016 12:00:00 AM
Commenter: Nadia
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. My name is Nadia, and I'm actually for the Millennium Bulk Terminal, and I don't have a speech written out because it was just a spur of the moment thing.

I just want to say that I lived in a poor town in the Pacific Northwest called Port Angeles, Washington, and we had a project that the Native Americans sold the land, and they knew there was dead bodies under the ground. So the Native Americans got pretty mad about it and stopped the whole project and they got the money from the land. That would have created a lot of jobs.

As well as if you have trouble breathing in this area, I would suggest moving to Port Angeles, Washington because of the Olympic National Park and how big it is.

And also if you don't like trains, move there as well. That's all I've got to say.

Thank you for allowing the public to comment on the Millennium Bulk Terminal proposal that is being considered by the state of Washington. As you know, this $680 million terminal would ship 44 million tons of Montana and Wyoming coal to Asia annually from Longview, Washington. I live in Montana and I have been well aware of the efforts of Arch Coal and others to mine coal here and ship it overseas to China and other ports along the Pacific Rim. I am not sure exactly where the source of this coal is designed to come from as Arch Coal has basically given up on their Otter Creek Coal Mine in southcentral Montana. And they have done so for many reasons. One is, best to my knowledge, the company declared bankruptcy. There is an inescapable fact that coal mining is in a state of decline across this country and it is in a state of decline because the costs to mine coal are increasing and because there are other sources to produce electricity which are more efficient than burning coal.

Even in China this is true where the overall economic picture is changing for they too want to reduce their reliance on coal. The data used to support the proposed export facility are outdated. China cut its coal imports by a third in 2015.[1] Coal prices have plummeted 62 percent in the last five years, and U.S. coal production has dropped by more than half since 2008.[2,3] Some 50 coal companies have declared bankruptcy since 2012.[4] There are many sources for this information. See below for references.

This is especially true when you consider the costs of environmental degradation. And along that front, exporting North American coal to be incinerated in Asia means more global warming here at home. That is a fact. The Northwest is already experiencing shorter winters, less snow, less water in our streams and rivers, more and more extreme forest fires. The same is true here in Montana. According to the Draft EIS by Cowlitz County and the Washington Department of Ecology, the terminal would increase global carbon emissions by 37.6 metric tons annually, the equivalent of adding seven new coal power plants a year. This is unacceptable. The ramifications of building the terminal have far greater impacts than just from the construction phase itself. You have to look at the operation and the purpose of the facility over longer periods of time. It is simply immoral to have a company like the Millennium Bulk Terminals to profit from such environmental degradation. All companies should have a social contract, an obligation if you will that they have a responsibility to the health of the world in which we all live.

And another environmental concern is that of air pollution and pressure on already weakened infrastructure across this country due to neglect and bickering over who is going to fund such restructuring. Adding 16 coal trains a day, half loaded, half empty to and from the Powder River Basin will simply add to that pressure. I understand that the increased trains will exceed current capacity in Idaho and Montana. Since trains go through the middle of our towns and cities, the increase in coal dust and diesel fumes will adversely affect the health of all humans in residential neighborhoods next to the tracks. You may say this is not a concern of the terminal facility or the state of Washington, but it is an indirect result of its existence if it were to be in existence. You will facilitate the infrastructure damage across interstate boundaries. This should be a direct concern to you.
I have also learned that a BNSF Railway study found that as much as a ton of coal dust can escape from a single loaded coal car. I have it from the same source, *"that other reports estimate that three percent of a coal car's load, which is typically 100 tons or more, can blow away in transit. The US Department of Transportation, meanwhile, classifies coal dust as a "pernicious ballast foulant" that can weaken and destabilize rail tracks."* [5]

Even the draft EIS mentions unavoidable and significant delays at rail crossings near the facility. But what about us who live east of there, those people in eastern Washington, Idaho, and Montana? Don't you think the impact will have the same negativity on our resources and infrastructure as well? And then there are our rivers and streams. Railroads parallel rivers in a great percentage of the time. Here in Montana, our rivers are for the most part still wild and healthy, and they support a vast recreational economy. Moving 44 million tons of coal a year threatens those rivers with the vast amounts of coal dust containing mercury, other heavy metals and other cancer toxins. We cannot afford to take a chance on this environmental degradation.

I urge a no build on the Millennium Bulk Terminal as being considered by the state of Washington. There were 6 proposals to build these terminals along the west coast. I know because I have commented against most of them as I am doing now. They were all defeated and this one should be as well for the sake of your environment and for the sake of ours and the worlds.

Thank you for this opportunity to comment. Please take my written comments above as my own and consider them as my own. Thank you once again.

Clint Nagel

[1] https://www.theguardian.com/environment/2016/jan/19/chinas-coal-burning-in-significant-decline-figures-show
[2] http://www.wsj.com/articles/peabody-energy-says-it-may-have-to-seek-bankruptcy-protection-1458129308
[3] http://insideenergy.org/2016/05/03/listen-to-u-s-coal-production-fall-off-a-cliff/
[4] http://thinkprogress.org/climate/2016/04/13/3768908/worlds-largest-coal-company-bankrupt/

[5] https://us-mg6.mail.yahoo.com/neo/launch?.rand=blgoeu9fhtr8h#623802211

Submission Number: ***MBTL-SEPA-DEIS-0002457***

Received: 6/10/2016 2:08:27 PM
Commenter: Francis Naglich
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. The company Millennium has patiently, at great cost, endured a very long and drawn out permitting process, almost unparalleled relative to other projects in the Northwest. That are providing extensive information in an EIS on the unavoidable impacts and mitigation that must be provided. While there will be impacts to the environment from this project, I do not believe those impacts will be un-mitigated, in fact they will likely mitigate beyond their level of actual impact. I am in favor of this project for the following reasons: Provides cleaner burning coal to Asia. Provides for the clean up of a previous contaminated aluminum smelter. Provides family wage jobs. Provides local and state tax dollars needed for public services. Provides for wetland and fish mitigation beneficial to our region. Can be handled in a safe and environmentally responsible manner. Thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001439***

Received: 5/28/2016 4:33:59 PM
Commenter: Robert Naish
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
No coal dust should be permitted to escape in the Columbia Gorge. Therefore unless the railroad can provide escape proof dust covers, the "No Action Alternative" shold be selected.

Submission Number: ***MBTL-SEPA-DEIS-0001580***

Received: 5/31/2016 5:23:34 PM
Commenter: Denise Nannemann
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003837***

Received: 6/14/2016 1:20:33 AM
Commenter: Claudia Narcisco
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments
Submission Text
Claudia:

My name is Claudia Narcisco. I am speaking for myself today. When I was trying to find some things that I was going to speak about, I found an old letter that I had written in I guess November 2013. There goes my letter. I had it on my phone and mailed it to myself. Anyway, it was hard enough to read. I emphasized that connection actions between the mine and the port and Asia and the impacts on climate change and how it would cycle back to us.

I requested that they consider this. I cited a section of the National Environmental Policy Act. I believe it was section F2 or 2F that specifically directed agencies to consider international ramifications of actions which is not something that we normally associate with, but it's just that it was our responsibility to do that. Obviously those things were not necessarily done, as far as I could tell, to this point.

I hope that's considered.

Steve Running: Yes, I want to particularly point out what I see happening in the global coal markets and global carbon cycle science. That's the stage that I work in, global carbon cycles. We, probably a decade ago, first identified really clearly that the biggest single carbon emission by humanity is burning coal for electric power. It became clear to us right at that point that everything else we do in trying to reduce carbon emissions wasn't going to matter at all if we didn't, first and highest priority, quit burning coal for electric power.

That was over a decade ago. It didn't seem like we were making much progress until about the last year. I can finally say that we've had a pretty good year in global policies. Obviously we all know about the Paris Climate Agreement where every nation signed on to a commitment for driving down carbon emissions, and for most countries that first biggest carbon emission is burning coal for electric power.

What's more immediately relevant to us here is that China not only signed the Paris Agreement, but China actually does a 5-year strategic plan for the nation. What a concept to actually plan the future of your nation. We've got learn something here. In the last 5-year plan, China has publicly announced that they will quit importing coal. What we're clearly seeing is that in 2014 and 2015, China's coal imports went down by actual statistics, so they're making good on this strategic plan that they've announced.

They are starting to drive down their purchasing of imported coal. Of course, their 2 biggest sources are Australia and us. They have already announced that they have a strategic objective to quit buying coal. I can't imagine a worse time for America to be building more coal infrastructure when the biggest customer has already announced publicly that they're going to quit buying. This is really almost a no-brainer.

What I also see now in this last year is that the world financial community has really started to catch on that long-term fossil fuel investment, and particularly long-term coal infrastructure investment, is just plain a bad idea. It's a bad investment. You have very high probability of losing your investment with the trajectory of the global economy and energy. When the world bank and Goldman Sachs, I read almost every week another major financial institution announcing that they are getting out of coal investment ... What we see here is the local version of that same decision point.

You would think this ought to be an easy decision, that the last thing the Pacific Northwest would want to do is invest in long-term infrastructure for coal export when a major customer has already announced that they're going to be capping their imports. I think this is to me, at the global scale that I work at and study and follow, this really should be a pretty easy decision then. This is certainly not a terminal that we want locally, but that even makes any sense in terms of a larger financial picture. It just doesn't make sense one bit. I think that's what I want to leave with you on this topic. Thank you.

Paul Smith: I'm really happy to get a chance to comment on the health implications of the increasing coal shipments by rail for our communities and others. It's easy to make the case that negative health impacts with coal will occur because they've been occurring for the last several hundred years. There's no reason to think a little bit more is better.

I hope to stress the health threats local to Missoula and also stress that this new threat will be greatest on the vulnerable, including children, infants, the unborn, and the elderly. I also have a list of references that I always feel nervous talking and making statements without. If anybody wants the list of the references that at least give the health implications, please see me. Because I take care of children and infants with lung disease, obviously my main concern at the local level is the increase in air pollution from these diesel fumes, coal dust, and worsening climate change.

Data is substantial showing that coal trains do increase bloom concentrations. Diesel emissions are recognized as carcinogens, which was previously noted, and contain toxic substances such as polyaromatic hydrocarbons and particulate matter or PM. Coal dust also adds to air pollution in the form of particulate matter. Of the 6 criteria of air pollutants that the EPA is mandated to regulate, particulate matter is perhaps one of the easiest to track and to correlate with health effects.

It's generated a vast amount of medical literature. We know there is PM increase as public health worsens. We also know that when we lower particulate matter, population health improves. That's an important concept and lends significant credibility to particulate matter being culpable, and justifies action that lowers air pollution. Particulate matter leads to lung damage and diseases such as asthma and COPD. Children are at the highest risk because their lungs are developing and they have more life years of exposure.

This often worsens over decades from accumulating scar tissue along the airways by repeated injury. We have no cure for asthma. For today's living asthmatic children, they may end up being tomorrow's asthmatic cripples. In health, particulate matter also leads to diseases distant from the lungs such as heart disease, stroke, and cancer and even adverse effects on pregnancies and fetal tissue. Infants born to a mother exposed to high concentrations of particulate matter are born smaller, and with impaired lung function.

These more systemic effects outside of the lung happen in part because fine particulate matter can also cross pulmonary system directly into the circulation and they release whatever poisons they contain. Missoula already struggles with air quality in a large part because of our valley inversions that attract pollutants. Despite strong efforts to decrease particulate matter, we often, here in Missoula, are close to the prescribed threshold by the EPA for particulate matter.

There is no safe lower threshold. The more time one spends in high exposure of particulate matter, the greater the effects. Again, this is of special concern to children. Another health concern with coal dust is increased chance of train derailments. You might recall an article in the Missoulian last year quoting the Department of Transportation estimating that there would be over 10 derailments per year in the US of trains carrying nothing but ethanol and oil cargo alone. Missoula is a very populated area. It's time we realize that with only 2 hospitals in our town, we would struggle to handle the type of derailment disaster that hit Quebec killing 47 and devastating a small

town.

Then finally the effects of coal combustion on climate change are already significant here in Montana. As it was noted, we've already come through 2 of the warmest years on records and the warmest April on record. Our snow pack is already lower than normal this year and it's disappearing. Our farmers and ranchers are threatened. Increased forest fires and hot weather will again threaten our health and our children's health.

By way of closing, one of my favorite quotes when giving a talk like this is from CF Elliot in 1909. He was then secretary of Anaconda Copper Mining Company. He stated, "We have the perfect right to carry on a legitimate business and if incidentally we should pollute the atmosphere nobody has the right to complain until specific damage gives them a cause of action." This statement really describes the position that we're in as a company.

We can't stop a process legally until we can show harm. By then, the ground, the air, and the water are contaminated, and our children are sick and it's too late. So ask yourself when we're coming through these discussions what angles are we heading in? Is the public being shouldered with the responsibility to prove harm or is the impetus on the industry to prove there's no harm? Harm to health has already been shown. There is specific cause for us to halt more pollution.

John: Good evening. I'm John Woodland. I retired in January as the Superior, Montana Fire Chief. I'm speaking from my background in emergency services, I do speak for myself. Superior is one of the many small towns along the rail line that this project will negatively impact. Emergency services and access to many of my district's neighborhoods require crossing the tracks. That's true of many other towns along the rail line. This is what's hauling our water supply across the tracks.

I personally waited at a grate crossing for a train to pass while on an emergency service response. This proposal lacked the train traffic. It increased the likelihood emergency services will be negatively impacted in communities all along the tracks. The tracks in Mineral County in places are built right along steep mountainsides next to the Clark Fork of the Columbia River. Trains fall off these tracks sometimes into the river and not that infrequently.

In my 10 years as the fire chief there have been 2 trains in the river in Mineral County. One visible from my home, included empty oil cars, and the other dumped Boeing fuselages into the Albertan Gorge. More traffic means more wrecks. More traffic will also mean more pressure not to hold up the trains for maintenance work which means yet again more wrecks. For Montana, Eastern Washington and Idaho, it also means less access and higher prices to ship agricultural products. For emergency services, today the 800-pound gorilla in the room is climate change.

If you don't think that's emergency service issue just look at the newspaper for the last week, at the evacuation of between 80 and 90,000 people from Ft. McMurray in May in

Northern Alberta, months before there's supposed to be a fire season in that part of the country. This is the future for the entire inter-mountain west if we don't act decisively now with climate change. We cannot continue to invest in fossil fuel projects, such as Longview, and have any chance of limiting the worst impacts of climate change. I urge you to say to no to the Longview Coal Port and yes to acting decisively on climate change now before it's too late.

Michael: My name is Michael Daniel Bolt. I'm a student at the University of Montana. I'm running for House District 98, Montana State District. I think preventing any new coal mining is the best choice. I'm also interested in bringing ideas of increasing government control over the natural resource industry including the coal industry. I believe government run operations of the coal industry would allow us to shut down that industry more responsibly and make any future natural resources extraction use projects really more beneficial to the Montana people. That's the main concession. That's all. Thank you.

Carolyn: Hello, my name is Carolyn Walker. I used to be Carolyn Alderson. I lived along the Tongue River for 20 years of my life. I raised my 3 children there. There is an interesting story about a law and a regulation that actually stopped something. When I lived down there, the Northern Plains Resource Council, I was part of it, was just beginning. That's when you all heard of the Tongue River Railroad. The Tongue River Railroad was thought of and started because there was a mining plan for that area, right on the Tongue River. It was called the Montco Mine.

Well there's a nice picture of me shaking hands with President Carter in 1977 at the signing of the strip mining bill. In that bill there's a piece of the legislation that says, "There shall be no strip mining on Alluvial Valley Floors." The Montco Mine was right on the Tongue River. It caused some difficulty in the community. I just wanted you to know that there are ways to use legislation and rules to stop bad things from happening. My recommendation is that we recommend no action on the Longview Port.

Jim: My name is Jim Parker. I live in Missoula Montana. As a Montanan along the rail corridor between the Powder River Basin mines and the proposed terminal I oppose the Millennium Bulk Terminals because of the associated increase in coal train traffic through my community. The increased coal train traffic will bring with it increased air pollution and health risks from increased coal dust and diesel exhaust and increased noise pollution.

In addition, the increase in coal traffic through my community will reduce access across the tracks and cause traffic delays for citizens, commuters, for emergency response vehicles when there's a medical emergency or fire, or a need for police. The additional train traffic will also provide greater potential for vehicle collisions with trains and for pedestrian accidents.

As a Missoulian and Montanan, I'm asking that the EIS fully analyze and consider the impacts of this port and the increased coal train traffic would cause here in Missoula and across Montana especially as it relates to the above sited impacts. The proposed project’s impacts are real and significant to Montanans and are connected in cumulative

result of what happens if this project is approved.

The EIS prepared by the court in the Washington Department of Ecology in Cowlitz County must include all the connected and cumulative impacts in Montana that will result if the MBTL facilities are approved and constructed. These include the significant connected and cumulative impacts on the project all the way back through Montana to the Power River Basin Coal Mines in Montana and Wyoming.

The increased rail traffic in Montana must be addressed, analyzed, and its consequences fully considered in the EIS. More trains in Montana will mean an increase in the amount of airborne pollutants, from diesel engines as well as from coal dust. Medical studies have shown a clear link between both diesel air pollutants and coal dust and disease.

While those with chronic disease, the elderly, young children, and pregnant women are most at risk, the health effects from particulate matter exposure may occur years later. Even healthy individuals need to be concerned. These issues must be addressed, analyzed, and their consequences fully considered in the EIS. The MBTL facility will directly lead to an increase in the burning of coal. The link between increased coal burning and associated public health problems cannot be ignored and should be included, analyzed, and the consequences fully considered in the EIS.

Finally, because the sole purpose of the MBTL facility is to facilitate the shipping of coal being transported from the PRB to its final destination in Asia, where it will be burned for energy, I also believe that the EIS must fully consider the long term and direct effects that this action will have on the global climate.

In conclusion, I strongly oppose the proposed Millennium Bulk Terminals Longview facility. The connected and cumulative impacts to Missoula, and all of Montana, from the proposed facility, are real and significant. The EIS prepared by the co-lead ggencies for this project must address, analyze, and consider all the connected and cumulative impacts this proposal will have on Montana. Please reject this proposal and take no action.

Thank you.

Harold: I'm Harold Hoem from Missoula. The whole town of Butte Montana went through a long period of horrible air quality early in this century because of ore smelting. Read a book called Smoke Wars. People sickened and then died especially underground miners like my grandfather who was cut down in the prime of life by lung disease. The corporate giants called the air pollution a nuisance. It was deadly. Oh, what a nuisance Biff was to my family.

What are some corporations proposing to do this century later but ship Montana coal overseas so citizens there can get sick and die from nuisance called coal? A friend of mine who was a former coal mine manager says this, "The problem with the coal mining industry is the product is a poison”. We know that CO2 is increasing dramatically. It is now over 400 parts per million. Humanity hasn't seen this stuff but it is affecting climate

change dramatically.

The current wildfire in Ft. McMurray in Alberta Canada caused the evacuation of over 88,000 people. The smoke from each building is hundreds of miles away. Perhaps a wake-up call for Montana. We have rapidly declining snow pack and are facing longer and harder, tired, and more dangerous fire seasons and possibly worse than Iroquois. For sure a nuisance for residents and a real downer for tourism. The DEIS gives Montana a scant potential.

They say 16 additional coal trains a day would go through Missoula that cite inflated numbers for existing traffic of 25 to 28 trains. We currently see only 13 to 15 trains. 16 more trains would double current traffic. The effects would ripple down all the impacts of safety risks, derailments, noise, dust, the laser crossings et cetera. They should know where our current capacity is and give assurances that deficiencies will be mitigated. My last word , bring down CO2 emissions by switching to renewables. Vote no action. Show the US means business in climate litigation.

Gary: I'd first like to thank Northern Plains and the Hoems in particular for it, and Les Anderson coming all the way from Longview to speak here. The speakers, it's been a very nice haven. Thanks for this opportunity to comment. Hi there, I'm Gary Mattson. I live in West Riverside, which is a suburb of Milltown. I really seriously, if the most serious effects of this port certainly have to do with health and climate change.

For those reasons, I am just baffled that so many people either ignore the science, or deny the science, or simply don't know about the science. I cannot understand why we have so many people that are not supportive of recognizing climate change demand. Some of the effects aren't realized. I can see in my community. Milltown has one singal entrance to it across on the south side of Powder River, there is one railroad crossing.

If that railroad crossing was blocked, no emergency services can occur. Our fire chief manager will recognize that concern. In Missoula County that's 10. That has a significant impact. The additional of 16 trains would really be a big impact on emergency services. For multiple reasons, I would strongly recommend that no action alternative.

George: Thank you, thank you all for being here. My name is George Price. I was asked to represent an organization I belong to named Indian People's Action. Indian People's Action asked me to be here as an environmental issues coordinator.

I would like to put our input collectively in here; just the fact the basis what coal is doing to our climate and the life on earth. I think that should be enough reason to keep it in the ground, not transport it anywhere. Anybody who's paying attention and looking at how fast this is escalating climate change to an unpredictable level at levels with all the other elements that are being released. Rising sea levels, you can go down the whole list if anybody's honest about that, you would say yes, let's stop all of this.

I'd also like to say let's look at the paradigm shift and deeply question a society that creates incentives for people to write environmental impact statements that are

intentionally lying to the people for profit, for money in a society that lives for money. I'm not going to go into my whole historian's diatribe there. I had often wondered what if the people who came from across the ocean, and likeminded people that welcomed innovation in Massachusetts had come to learn instead of to control. It's great. Can we start on the right foot now? I recommend the no action on behalf of Indian People's Action of Montana.

Dave: Hi, my name is Dave Dittloff. I'm the regional representative for National Wildlife Federation. Most of you are probably aware of National Wildlife Group. We're the folks who put on Ranger Rick Magazine. That's our biggest identifier here with the kids.

In 3, 4 years that that's going to take, yet there's nothing coming back up the streams in order to spawn salmon. The impacts are almost certainly down to relating to some of the impacts here. Last year, last summer's conditions literally had most of the species dying, most of the adults coming back to the rivers and streams here to the headwaters of the Columbia River Basin died due to high temperatures, directly related to climate change.

I want to talk a little about, quickly here's something that hasn't been hit hard today, talk about wildlife. It starts right from the beginning. You look at the mine site here, the direct habitat displacement, the coal recommendation that follows it, that impacts wildlife. If you look at what happens on the mine sites with water, that impacts fish and wildlife. The next connector we look at has it transferred over? We look at the trains. There's been a lot of talk about human health and consequences here which are really important. Those same impacts are related to wildlife for particularly the fisheries here. That coal dust gets in the streams. There's mercury concern with it here and other neurological issues are a concern.

Mercury is bad for people eating the fish as well. We've got dozens of streams and multiple dozens of lakes in Montana that had mercury consumption warnings here. You can only eat so much of the fish. That's an impact to wildlife. You look at the ports, same thing here. The direct construction of the ports, this place is habitat for sure. That has real consequences to the fisheries. You'll see salmon come in and out of the ocean as well here.

Lastly, climate change, I got to talk to you about salmon. Name a critter, even the biggest critters, white tail deer, elk, etc. that think generalist that those are for generalist. There's impacts here. More and more research that's done it's really impact of Montana's out pour heritage, it's culture, what we like to do here whether it's sightseeing, hunting, fishing, what have you here. Fishing is a multi-billion dollar industry in Montana and the Pacific Northwest. There's economic reasons associated with wildlife as well here. I appreciate it. No action alternative makes sense for wildlife.

Dave Jones: Hello, my name is David Jones. I've been a fly fishing guide in Montana for over 30 years. Dave just inspired me to get up here and talk about what I see in my career fishery that I work primarily in. My season has been shortened by an average of about 6 weeks in the 30 years I've been doing this. We don't have clients in August anymore at all because of

the low flows. Half the time our rivers are shut down because we have to worry about railing over there. Anybody that watches the forester around in the spruce moss and the beetle kill, it's just obvious that Montana is being really affected. We mentioned the economic impact, but really we're talking genocidal, ecocidal impacts for climate change. We ought to think in those terms really. This is an emergency. I recommend no action on the terminal. Thank you.

Steve: Hi, my name is Steve Schwartz. I live here in Missoula. I'm a professor interior of the Department of Communication Studies at the University of Montana. I teach and do research in environmental communication. No matter what the coal industry says about the free market, their goal is to get government on their side to make the market work for them whether it's supporting carbon cash receipt frustration, whether it's blocking the clean power plan, or supporting coal export infrastructure like MBT as a goal. It's past time for us to use our voice to remind government agencies who's side they need to be on and who's interest they need to represent.

The connected and key note we've heard about tonight on public health and safety, on air, land, and water, on wildlife, and on climate change are common in house. They're shared by the residents of the Pacific Northwest, shared in common by the people who live in Washington and Idaho and here in Montana. We all deserve a voice in this decision. For that reason, I want to thank all the organizations that have made this opportunity possible for so many of us to express our voices. To protect the commentators in the Department of Ecology, to take no action, thank you.

Jim: My name is Jim Roach. I've been a Missoula resident for 45 years. I don't understand why it's draft Environmental Impact Statement doesn't address impacts for rail traffic in Montana. That seems sort of ridiculous. It seems like a rip off. On behalf of my family, and my friends, and a lot of people that I know are neighbors, I just want to say we don't want any more coal dust. We don't want any more diesel fumes. We don't want any more threat of derailment. We don't want traffic complications from increased rail traffic. We don't want the noise.

Most of all we don't want the climate impact. We don't want the endless smoky summers. We don't want the low stream flows and the sick fish. We don't want the reduced fishing opportunities. We don't want increased beetle kill. We don't want disappearing biodiversity. We don't want damage to agriculture. We don't want the drought. We don't want climate refugees. We don't want shut downs of skiing areas. We don't want this action, no action. Thank you.

Claudia: My name is Claudia Narcisco. I am speaking for myself today. When I was trying to find some things that I was going to speak about, I found an old letter that I had written in I guess November 2013. There goes my letter. I had it on my phone and mailed it to myself. Anyway, it was hard enough to read. I emphasized that connection actions between the mine and the port and Asia and the impacts on climate change and how it would cycle back to us.

I requested that they consider this. I cited a section of the National Environmental Policy

Act. I believe it was section F2 or 2F that specifically directed agencies to consider international ramifications of actions which is not something that we normally associate with, but it's just that it was our responsibility to do that. Obviously those things were not necessarily done, as far as I could tell, to this point.

I hope that's considered.

Submission Number: ***TRANS-SPOKANE-M1-00031***

Received: 5/26/2016 12:00:00 AM
Commenter: Claudia Narcisco
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Claudia Narcisco. I live in Missoula, Montana. I'm here to represent the over 2,000 members of the Montana chapter of the Sierra Club.

The Longview terminal is only one increment in conveyor belts of connected actions that stretch from the mines in Montana to the railroads to the coal terminal to Asia where it's burned and back again as pollution on citizens and the ecosystems of the United States.

Incrementally these actions contribute to climate change, the crisis of our time. International climate change is displacing large populations of people and wildlife, all unprecedented. It is heading to enter into our food and water and is at the root of many conflicts.

In Montana, climate change is impacting our wildlife, our world-class grizzly population, lynx, wolverine, and other ecosystem species.

We share with Washington the melting of our glaciers. This is not only esthetic on the parks, it is also a hydrologic problem, and cold-water fisheries problem.
The Columbia River treaty is currently being renegotiated. In addition to hydropower, this new treaty is emphasizing ecosystem values. The Longview terminal is inconsistent with these values.

The Montana chapter Sierra Club supports the people and leadership of Washington State and their approach of climate change.

On the one hand, these include a move toward renewable energy --

EVENT HOST: Thank you. Feel free to leave your written comments.

Submission Number: ***TRANS-SPOKANE-M1-00076***

Received: 5/26/2016 12:00:00 AM
Commenter: Nate
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
My name is Nate. I live and work in Missoula, Montana.

I just graduated with a Master's in Science in Environmental Studies. I envision spending a whole lot of time studying ecology and policy. I also spent a lot of my last three years learning a lot about the craft of storytelling. I taught an English undergraduate writing class at the university. So I know a lot when it comes to a bad essay or bad writing, and I'll tell you a couple of conditions for that, not very imaginative, lofty assumptions, faulty logic, preachy didactic. I'm in the business now of writing better stories, new stories, myself. I think a lot of us here are here to write a better new story.

Unfortunately, we're concerned about the old story which is one of the effectuating reasons for climate chaos. We're actually here to write a new story, one of life, of vitality, of functioning feedback loops, of self-correction, humility, restraint, community vibrancy.

Our old stories are failing us. Our old stories are failing us. They're unimaginative, they're boring, they're terrifying. So let's give ourselves a little more credit as creative storytellers, let's stretch our imaginations.

Every time you hear the word Longview, I invite you to write in your margins longer view which is accept the longer view, one that's a viable future for this planet not just simply jobs and short-term gain. Thanks.

Nathan, Lisa (0083)

Submission Number: ***MBTL-SEPA-DEIS-0000083***

Received: 5/5/2016 9:20:38 PM
Commenter: Lisa Nathan
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to state my opinions on this important issue. Media coverage would have us believe that transporting coal by rail through our state is unprecedentedâ€"it’s not. We’ve transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. I appreciate you considering this feedback.

Submission Number: ***TRANS-LV-M1-00048***

Received: 5/24/2016 12:00:00 AM
Commenter: Lisa Nathan
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Lisa Nathan. I'm a Longview native. I believe Cowlitz County needs family wage jobs. My prior job moved from Longview to Vancouver leaving me unemployed. It took over a year to find a job in this community. Of course I could have commuted but that would have been a two-hour commute daily. Thanks to Millennium Bulk Terminals I have a stable, family wage job that allows me to spend valuable time with my grandkids. As stated over and over again, Millennium is committed to adhering to the strict environmental standards that are in place to protect our community. Despite all the rhetoric to the contrary about coal exports, I firmly believe you can have both good family wage jobs and be good stewards of the environment. It doesn't have to be choice of one over the other. Thank you.

Submission Number: ***TRANS-SPOKANE-M1-00045***

Received: 5/26/2016 12:00:00 AM
Commenter: Lisa Nathan
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Lisa Nathan, and I'm from Longview, Washington. I'm a Longview native.

I know that Cowlitz County needs family wage jobs. My prior job moved from Longview to Vancouver leaving me unemployed. It took me over a year to find a job in this community. Of course, I could find jobs in the Portland area, but that would have been a two-hour commute daily.

Thanks to Millennium, I have a stable family-wage job that allows me to spend valuable time with my family. Millennium has been a good community member for the last five years. They support local charities and many of the employees, including myself, are active volunteers. As stated over and over again, Millennium is committed to adhere to the strict environmental standards that are in place to protect our community.

Despite all of the rhetoric on the contrary about coal exports, I firmly believe that you can have both good family-wage jobs and be good stewards of the environment, and it doesn't have to be a choice of one over the other.

Naylor, Michelle (0840)

Submission Number: ***MBTL-SEPA-DEIS-0000840***

Received: 5/24/2016 12:33:02 PM
Commenter: Michelle Naylor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing about the Millennium coal export project. I believe this project is good for the community. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold's site. They are an important part of our community and economy and will do even more great work once their permits are granted. This is an old industrial property being redeveloped. Keep the review to what is normal and factual. Sincerely, Michelle Naylor Naylor1005@gmail.com 82604

Submission Number: ***MBTL-SEPA-DEIS-0001283***

Received: 5/26/2016 6:38:29 PM
Commenter: Shawn Neary
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! This DEIS is being finely crafted. The progress this port represents should not be hampered. It's time to get folks back to work!

Submission Number: ***MBTL-SEPA-DEIS-0000842***

Received: 5/24/2016 12:35:49 PM
Commenter: Bob Nebeker
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Moving this project forward is important to me, my family and my community. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don’t hold them up any longer. Sincerely, Bob Nebeker bobneb0951@gmail.com 98632

Submission Number: ***MBTL-SEPA-DEIS-0002350***

Received: 6/9/2016 5:36:04 PM
Commenter: Bob Nebeker
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. Cowlitz County has a chronically high unemployment rate. There are environmental impacts of building trades and longshore workers having to travel as far as the Port of Seattle for work on a daily basis, instead of going to a job at Millennium. Let’s keep our jobs local! The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001696***

Received: 5/31/2016 6:54:18 PM
Commenter: Brennan Nelson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our economy and our families are suffering. We can do something about this by supporting the proposed port at Longview that will put people to work quickly and will keep them gainfully employed for years to come. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium's proposal is unprecedented and has far reaching economic implications. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001639***

Received: 5/31/2016 6:09:22 PM
Commenter: Charlotte Nelson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I've been following this issue, and am glad to have the chance to weigh in. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001287***

Received: 5/26/2016 6:41:21 PM
Commenter: Dirk Nelson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Allow me to submit my comments regarding Millennium Bulk Terminals proposed port at Longview. I fully support this project. When the trains are loaded in Montana, Millennium puts a liquid cover like a glue on top of the cars. This eliminates a lot of the coal dust that would normally come off of train cars. Millennium is building this world class export facility right! Remember what matters and keep the focus local! Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0000413***

Received: 5/17/2016 6:31:30 PM
Commenter: Fred Nelson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the opportunity to add my voice to that of others in supporting the environmental study for the proposed port at Longview. The DEIS will present a clear picture of how Millennium Bulk Terminals will proceed in opening and operating this port and the economic, environmental, and social benefits of this project are deserving of approval. Media coverage would have us believe that transporting coal by rail through our state is unprecedented, it's not. We've transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Nelson, John (0723)

Submission Number: ***MBTL-SEPA-DEIS-0000723***

Received: 5/23/2016 1:18:23 PM
Commenter: John Nelson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Millennium Bulk Terminals has proposed a coal export terminal at Longview that is both environmentally-sound and economically beneficial. I ask that you approve this project and the environmental study without delay. In Longview, 56% of kids need free and reduced price lunch at schools and go home to neighborhoods facing 8% unemployment. We cannot afford to look the other way when projects in this area guarantee new jobs and private investment in our schools, roads, and local services. In fact, the estimated number of jobs related to construction activity at the Millennium Bulk Terminals project is 1,350 temporary direct jobs - that will mean $70 million in direct wages! When the project is completed there will be about 135 direct jobs and about 165 indirect jobs. These numbers simply cannot be ignored. Remember this project's economic benefits to the local community. Thank you for reviewing my comments today.

Submission Number: ***MBTL-SEPA-DEIS-0003170***

Received: 6/13/2016 6:16:50 PM
Commenter: John Nelson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am proud to add my voice in support of the Millennium Bulk Terminals project in Longview. The project is an excellent opportunity for the community and I am thrilled to see that Millennium has made strong commitments both to the economy and to the environment. Not only will it bring more jobs to the Community the people with those jobs will be spending money in this community. Supporting other business including stores to support the families. Other business will gain by the need to support the on going business of Millennium Bulk, which is much needed in the Community. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible. Sincerely, John Nelson john@woodslogging.com 98632

Nelson, John (3648)

5-24-16

John Nelson
524 W 3rd Pl
The Dalles, OR

The Millennium Terminal would result in 44 million tons of coal per year hauled through the Columbia River Gorge Scenic Area in open coal cars. Think of the 18 trains, each with 120 uncovered cars spewing more than 10,000 pounds of coal and coal dust on the ground and in the Columbia River as they travel through the Gorge. Why not keep fossil fuel in the ground? Our challenge as humans is to save ourselves from an earth that if pushed too far has the power to literally cast us off. We are making our world uninhabitable due to the myriad effects of climate change and global warming. If you consider the coal dust and diesel emissions that are generated by transporting 44 million tons of coal a year, this project would be one of the biggest greenhouse gas emitters in the state of Washington. It would be a giant step backwards from recent clean energy policies passed in Washington.

The Draft Environmental Impact Statement should address more closely the practical impacts for people who live in the communities in the Columbia River Gorge. It is well documented that coal discharge from existing coal trains is contaminating the air, land, and water in the National Scenic Area. In some locations coal accumulates in layers several inches deep along the banks of the Columbia River. The DEIS fails to adequately consider the impacts of coal train traffic and the associated coal dust on the scenic, natural, cultural and recreation resources of the National Scenic Area. We have spent millions of dollars recovering salmon in the Columbia River and protecting tribal harvest. This project will reduce access to the river for tribal fishers because of the sheer increase in the volume of train traffic, in addition to harming salmon habitat.

Trains from the coal mines to the terminal will go through other communities besides the ones in Washington. Those communities too will face delays, traffic problems, and pollution issues. Yet those problems are not identified in the EIS. Along the entire route there are many serious impacts to our health and the environment that are not tolerable and should, on that basis alone, support the rejection of this terminal.

Nelson, John (3643)



Nelson, John (3643)

Horsethief Lake State Park, WA
Earth day 2016

Photographer
John Nelson
The Dalles, OR


Nelson, John (3643)

Nelson, John (3643)

Horsethief Lake State Park, WA
Earth day 2016

Photographer
John Nelson
The Dalles, OR

Submission Number: ***TRANS-LV-Q2-00031***

Received: 5/24/2016 12:00:00 AM
Commenter: John Nelson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is John Nelson. I'm from Vancouver, Washington. And I want to reflect on the testimony I heard today from a young man who called in by phone from China to express what the Chinese are saying about no longer wanting the coal. Data has shown that imports to China of coal have dropped dramatically over the past several years. The citizens of China have protested over the pollution that the coal burning has created. Even the Chinese government recognizes this as a crisis, and they're responding by changing their strategies to more sustainable and environmentally friendly fuels. Just last month, coal, as a source of producing electrical energy in the United States, is no longer the number one fuel. It has dropped. It's being recognized slowly but surely in this state that it's no longer a viable approach. It's no longer a viable approach. The curve for sustainable energy, for solar and wind, is trending. The potential for those energies to provide the transition to a better future are clearly there. And we need to reject this proposal and move on to a better future.

Nelson, Karen (0856)

Submission Number: ***MBTL-SEPA-DEIS-0000856***

Received: 5/24/2016 1:07:44 PM
Commenter: Karen Nelson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs and the proposed port at Longview will create much needed employment for hundreds of Americans. Please include my comments as part of the public response to Millennium Bulk Terminals plan. Cowlitz County has a chronically high unemployment rate. There are environmental impacts of building trades and longshore workers having to travel as far as the Port of Seattle for work on a daily basis, instead of going to a job at Millennium. Let’s keep our jobs local! We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage? If people insists "we can do better"

Submission Number: ***MBTL-SEPA-DEIS-0001087***

Received: 5/24/2016 7:13:27 PM
Commenter: Lynn Nelson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Millennium Bulk Terminals will bring jobs and stability to Cowlitz County. Export projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let’s get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Nelson, Michelle (0638)

Submission Number: ***MBTL-SEPA-DEIS-0000638***

Received: 5/20/2016 1:23:53 PM
Commenter: Michelle Nelson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Millennium Bulk Terminals is the best job I've ever had. I have been onsite for 10 years. This is the longest I have ever stayed with one company. Since I started working here, I have been able to pay off old debt, buy a new house, and buy a new car. Several of my co-workers have also bought new homes and vehicles. I want all of my friends and family to have this kind of opportunity. These family wage jobs are hard to come by in this area. The draft EIS was thorough and sufficient. Please proceed promptly to the final EIS, so that we may begin building and hiring our local people who desperately need these good paying jobs.

Nelson, Michelle (2370)

Submission Number: ***MBTL-SEPA-DEIS-0002370***

Received: 6/9/2016 5:52:45 PM
Commenter: Michelle Nelson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm glad to have the chance to make a comment about this project as it's very important to me. Regulators have been looking at this project for years, and it's time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments, it's time to let it. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0003178***

Received: 6/13/2016 6:19:53 PM
Commenter: Rod Nelson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000972***

Received: 5/24/2016 5:42:26 PM
Commenter: Shane Nelson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please move forward with the government’s environmental study. I say let's get moving with the Longview port ASAP. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done!

NEMEC, FRANK (0331)

Submission Number: ***MBTL-SEPA-DEIS-0000331***

Received: 5/11/2016 2:38:57 AM
Commenter: FRANK NEMEC
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and wan to underscore my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing market, thereby spurring greater investments at home. Washington has long depended on trade and exports as vital part of our economy, directly and indirectly creating nearly 40 percent of all of our stat's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Ness, Daryl (2872)

Submission Number: ***MBTL-SEPA-DEIS-0002872***

Received: 6/13/2016 2:56:11 PM
Commenter: Daryl Ness
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002562***

Received: 6/12/2016 10:28:24 PM
Commenter: Margaret Neuman
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The proposed coal export terminal in Longview and the increased transportation of coal to the terminal have unacceptable environmental impacts, which are documented in the EIS. I am opposed the the development of additional export terminals and additional transportation of fossil fuels by rail. Please do not approve the new coal terminal in Longview.

Submission Number: ***MBTL-SEPA-DEIS-0002152***

Received: 6/7/2016 6:39:09 PM
Commenter: Rob Neuman
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it's time Longview went back to work. When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002584***

Received: 6/13/2016 9:18:29 AM
Commenter: Kirk Neumann
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***TRANS-SPOKANE-Q4-00005***

Received: 5/26/2016 12:00:00 AM
Commenter: Teresa Nevins
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Teresa Nevins. It is said that our children come first, that our children are our most important resource yet coal burning pollution containing mercury sulfide carbons harm the health of children. This pollution causes respiratory disease like asthma which can be life threatening.

If we export even more coal, we are saying we don't care about the health of our children or their lives. Actions speak louder than words. Let's put our children's lives ahead of big profit for just a few people. Thank you.

Newberg, Ellen (3369)

Submission Number: ***MBTL-SEPA-DEIS-0003369***

Received: 6/13/2016 11:19:00 PM
Commenter: Ellen Newberg
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The oceans have become so acidic that our local oyster industry has to send the baby oysters to Hawaii to form enough shell to survive in our waters. The acidification of our local salt water is also preventing baby Dungeness crabs from developing their exoskeletons. This is a wake-up call that we have already dumped enough carbon into the atmosphere. We do not need to send more coal to Asia or anywhere else to exacerbate this problem. We do need to develop clean energy. No coal port at Longview!!!!

Submission Number: ***MBTL-SEPA-DEIS-0000475***

Received: 5/17/2016 7:55:42 PM
Commenter: Daniel Newhouse
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete it’s time for progress. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let’s be clear â€" the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0002008***

Received: 6/6/2016 2:55:28 PM
Commenter: Thomas Newman
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs and the proposed port at Longview will create much needed employment for hundreds of Americans. Please include my comments as part of the public response to Millennium Bulk Terminals plan. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. Enough with the schedule delays, bring this process to a close.

Submission Number: ***MBTL-SEPA-DEIS-0000736***

Received: 5/23/2016 1:44:21 PM
Commenter: Bryan Newsome
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I write today in support of Millennium Bulk Terminals coal export terminal. This is a project that is easy to support because it will benefit families both within and outside of its southwest Washington location. The project presents a path to employment for manyâ€"let's makes it happen. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Submission Number: ***TRANS-SPOKANE-M1-00065***

Received: 5/26/2016 12:00:00 AM
Commenter: Amber Newton
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. My name is Amber Newton, and I live in Spirit Lake, Idaho.

My family has been in the railroad industry for over 50 years. That's what I grew up with. I am in support of the Millennium project.

I believe that this area and all of the areas along the line need the jobs that come with this project. I know that there are concerns for the environmental impact, but I believe that they've taken those into consideration.

And I can see that people say this is a short-term solution or short-term project, but I believe that if we don't address the short term, we're not going to make it to the long term.

The railroad has built this country, and I just believe that this is a project that we need in order to keep our jobs and keep our middle-aged workers working. Thank you.

Submission Number: ***TRANS-SPOKANE-M1-00029***

Received: 5/26/2016 12:00:00 AM
Commenter: Don Newton
Organization: UP
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Good afternoon. My name is Don Newton. I work for UP. I live in Spirit Lake, Idaho.

I'm in complete support of this project. Jobs are one thing, that's great.

They say we have global warming. Well, we suffered plague before we were all here. It flooded this whole country. Global warming happens with or without us. Solar energy isn't always the answer. It's proven that in the Mohave Desert.

So we need the cleanest coal going over to China that we can ship, and that comes out of the Powder River Basin.

That's all I have. We need these jobs.

Submission Number: ***MBTL-SEPA-DEIS-0001652***

Received: 5/31/2016 6:17:02 PM
Commenter: Anthony Nicholls
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete â€" it’s time for progress. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium’s proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***TRANS-LV-Q1-00043***

Received: 5/24/2016 12:00:00 AM
Commenter: Majorie Nichols
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm Marjorie Nichols and I'm from Kelso, Washington. I'm a local person, I live here, and I feel the coal terminal is a bad idea for Longview and Kelso and a bad idea for the Columbia River and a bad idea for America and bad idea worldwide. So I really don't like having this coal terminal in our front yard based on studies of the terminals, the one near Canada and the one in Virginia. The soil samples that are within one kilometer contain 20 percent by weight of coal dust and, if you get out five kilometers, that's three percent of coal dust and, if you go out 12 kilometers, that's one percent of coal dust. And all of this coal dust coming out, depending on how close you live to the terminal will affect the health of a majority of us in the Longview/Kelso area and the schools which our children attend. We will have to bear the cost of monitoring this coal dust and cleaning up after it as it sticks to our windows and buildings and pay for any health cost or safety preventive measures. It's most likely to be the hardest on the young and the old, and I'm older. The increase in number of trains will add to this pollution and also increase our taxes to pay for the changes in the railroad tracks going through town. This change benefits only the company for exporting coal, and they say they will not pay for any railroad changes in town needed for their 44 million tons a year of coal exporting. This is inexcusable, unacceptable. The Columbia Gorge green zone is one of my favorite places to walk in both on the Oregon side and the Washington side. It was established by President Reagan, and is a thin line of green on both the Oregon and Washington side of the Columbia River. The green zone is set aside to preserve the area for future generations, and there are laws to protect this green zone. It is our responsibility, I feel, to protect this zone for its intended uses. I wonder how much pollution will be caused by the increase of trains carrying coal through that area, how much noise we can tolerate from the constant train traffic. I believe that Millennium will have disastrous consequences on this area. It is one of our best loved scenic wonders and a great place to hike and enjoy the scenic Columbia River. Also I learned the other day that on both sides of the river they are working on trails and bike paths to complete them and make a complete loop and are thinking ahead toward a world-recognized area, scenic area, and I think this is better than anything a coal terminal could create for us. Exporting coal is a bad deal for America. Coal is one of our natural resources that cannot be replaced. We do not know of future uses for coal that might benefit mankind. Carbon is a basic element for all life and air we breathe. We need to keep the natural resources where they can't be renewed in our country for future use. Depleting a natural resource and selling it to China creates only more world pollution. We have emission standards here and coal burning is declining in the U.S. our government has promised the world to have higher standards. Why, oh, why would we want to be personally party to creating more world pollution by shipping coal to China to burn it? This is counterproductive to global warming and everything we know to protect our world for future generations. Times have changed. Burning coal is on the way out with less and less use since 2010. Companies like Millennium are going bankrupt. Millennium has a rocky history brought to light by the New York Times in 2010 misleading us with their coal exportation plans. They are not wanted in my community. No-action alternative. Thank you.

Submission Number: ***TRANS-LV-M2-00119***

Received: 5/24/2016 12:00:00 AM
Commenter: Margie Nichols
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm Margie Nichols (phonetic). I live in Kelso, Washington. I feel the coal terminal is a bad deal. I don't think this is just about jobs as jobs go. I have four children. I have lived -- started out in Woodland, Washington, lived in Portland for a while, and we've lived up here for 15 years -- 16 I guess now.

I have four children. All work. They didn't depend on jobs that were in this community. I have one in California, I have one in Seattle, I have one in Maryland, and I have one in Wyoming. I have three girls. All three girls work, and my son works, and his wife works.

So it's about jobs only in this city of Longview. And I think it's wrong to affect all these other places and all these other people all the way along the railroad tracks all the way on both sides of river and putting this plant here.

And also in putting this plant here, no other reasonable industry that's nonpolluting will want to build a plant nearby. They won't do it. You are limiting -- with accepting this, you are limiting the companies that will come in and have a more sustainable industry.

This is not what I was going to say originally. I'll go back to where I was originally. Okay. I'm very fond of the Columbia Gorge green zone that was established by President Reagan. It is thin lined and green on both sides of the Columbia River.

This green zone is intended to preserve the area for future generations. There are laws that protect this green zone. It's a wonderful place to hike and enjoy the scenic Columbia River Gorge.

How much pollution is going to be caused by the trains carrying coal? How much noise will be tolerated from constant train traffic? This area has the potential of being a world class destination for hiking and biking. And the plans are there to build a trail loop along the corridor. No action alternative.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002072***

Received: 6/7/2016 4:34:12 PM
Commenter: Matt Nichols
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Despite all the rhetoric to the contrary about coal exports, I firmly believe you can have both good family-wage jobs and be good stewards of the environment. It doesn't have to be a choice of one over the other. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let's be clear, the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project, without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. Please reach out with any questions

Nield, Kaylynn (2655)

Submission Number: ***MBTL-SEPA-DEIS-0002655***

Received: 6/13/2016 12:24:43 PM
Commenter: Kaylynn Nield
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001232***

Received: 5/26/2016 6:08:29 PM
Commenter: Richard Niemiec
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the opportunity to add my voice to that of others in supporting the environmental study for the proposed port at Longview. The DEIS will present a clear picture of how Millennium Bulk Terminals will proceed in opening and operating this port and the economic, environmental, and social benefits of this project are deserving of approval. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let’s be clear â€" the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. Thank you for accepting comments for this important project. Please make the necessary steps to move forward on its approval as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0000252***

Received: 5/10/2016 6:03:31 PM
Commenter: Clyde Nihipali
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. MBT has received a thorough and comprehensive draft EIS review one five years in the making. If we don't take the next step forward and turn this vision into a reality, it's going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays.

Submission Number: ***TRANS-LV-Q1-00067***

Received: 5/24/2016 12:00:00 AM
Commenter: Nina
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Nina. I worked in clinical research for 20 years. My husband and I moved to Camas a few years ago to live in this beautiful, unpolluted quiet area. The coal trains traveling through Camas will greatly increase noise pollution. The City of Camas passed Resolution Number 1235, which mentions and includes the following: Noise from the trains and the train horns, also Washougal, have five at-grade crossings, which is a neighbor of Camas, and Camas actually provides the emergency equipment and response teams for Washougal. The coal trains will impact emergency response times in our community. The DEIS states that only 60 residences would be exposed to severe noise impacts. We live over one mile away from the tracks in a new, well-insulated house, and we hear the trains loud and clear from inside our house. Data in medical journals show that from noise pollution in adults, short and long term adverse effects of noise pollution have been documented including heart disease and strokes. My husband had a heart attack before we moved here. We moved to what we thought was a quiet, unpolluted area. I'm very concerned that the coal trains will increase the cardiovascular adverse effects on my husband and all Camas residents. Please recommend the no-action alternative or at the very least include a health impact assessment including noise and cardiovascular health in the final Environmental Impact Statement.

Submission Number: ***MBTL-SEPA-DEIS-0000741***

Received: 5/23/2016 1:48:56 PM
Commenter: George Nixon
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

Noble, Russell (0620)

Submission Number: ***MBTL-SEPA-DEIS-0000620***

Received: 5/19/2016 7:35:05 PM
Commenter: Russell Noble
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001535***

Received: 5/31/2016 4:52:52 PM
Commenter: Sam Noblin
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. In regards to coal dust & human health impacts: Please refer to the American Lung Association's report on state / county rankings. First please note that the incidence of pediatric and adult asthma for Cowlitz Co is 9.1%, Clark Co. is 9.0%, and Yakima Co is 8.9%. Then compare this same statistic to communities where coal is produced or shipped through such as Campbell Co WY at 9.0%, Box Butte Co, NE (Alliance) 6.96%, Lincoln Co NE (North Platte) 6.98%, or St. Louis Co MO 7.68%. Further, the ALA ranking for 24 hr particulate matter in Campbell Co WY scores a grade of B, as compared to Clark Co WA at F and Yakima Co WA at F. The evidence is obvious, coal production and transportation is not causing a health problem, but it can act as a remedy to an economic downturn. Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done!

Submission Number: ***TRANS-SPOKANE-M1-00032***

Received: 5/26/2016 12:00:00 AM
Commenter: Hap Nolan
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for having me here. My name is Hap Nolan. I was born and raised in Sandpoint, Idaho and still currently live there.

I'm here to support the no-action alternative. I'll just touch on a few points how this terminal would affect me in a negative way. I competed in the World Cup as a professional snowboarder for six years, traveled the world, and was able to see some beautiful places.

I personally witnessed how climate change affected local snow packs not only here but internationally as well.

The science is out. Burning coal releases carbon emissions which greatly affects climate change. It's hard to argue that anymore. I'm not sure where people are finding their science.

In the summertime, I own a wakeboard and boat rental operation. I have successfully grown over the past six years. We employ local residents in that area. We depend directly on the health of Lake Ponderay and so does this community of Sandpoint.

Additional coal trains coming through the area are a major risk to Lake Ponderay and Sandpoint. If a derailment occurs anywhere along the line, the Clark Board River or Lake Ponderay, it would devastate our waters and our local economy. Thousands of people would suffer from one derailment.

In closing, the risk to the global climate and the risk to our local economy greatly outweigh any short-term benefits that this terminal may offer. We have better alternatives for power and jobs.

Please support the no-action alternative. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003124***

Received: 6/13/2016 5:50:02 PM
Commenter: Mackenzie Nolan
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs and the proposed port at Longview will create much needed employment for hundreds of Americans. Please include my comments as part of the public response to Millennium Bulk Terminals plan. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water â€" coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! Our region is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal will help our recovery. Thank you for beginning the scoping process. Sincerely, Mackenzie M Nolan mnolan@archcoal.com 82718

Submission Number: ***MBTL-SEPA-DEIS-0001495***

Received: 5/31/2016 1:42:39 PM
Commenter: Leonard Norby
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. Regulators have been looking at this project for years, and it’s time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments â€" it’s time to let it. The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality. Sincerely, leonard norby leonard.norby@yahoo.com 59105

Submission Number: ***MBTL-SEPA-DEIS-0001508***

Received: 5/31/2016 2:27:19 PM
Commenter: Leonard Norby
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

This is a great use of an old industrial site. We need more companies willing to clean up and utilize brownfield sites. Regulators have been looking at this project for years, and it’s time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments and it’s time to let it. I greatly appreciate you considering my input. Sincerely, leonard norby leonard.norby@yahoo.com 59105

Submission Number: ***MBTL-SEPA-DEIS-0001982***

Received: 6/6/2016 2:34:21 PM
Commenter: leonard norby
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please move forward with the government’s environmental study. I say let's get moving with the Longview port ASAP. Cowlitz County has a surplus of industrial sites which impedes the development of the Reynolds Smelter site (due to cost of remediating and redeveloping a brownfield site). Millennium is taking on the redevelopment and can turn around a dilapidated, underutilized site. Grant the project its permits! Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

Submission Number: ***MBTL-SEPA-DEIS-0003167***

Received: 6/13/2016 6:14:55 PM
Commenter: Arne Nordahl
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***TRANS-LV-M2-00100***

Received: 5/24/2016 12:00:00 AM
Commenter: Tim Nordgren
Organization: Labor Union 737
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Tim Nordgren (phonetic). I work in the building trades, with the labor union 737. And I started a new job attending masons today. I'm exhausted. I'm unprepared, but I'm here because I'm really tired of being fed the carrot on the stick that tells me that we should sell out the next generation.

I mean, most of us have kids in the trades. I'm tired of listening to that rhetoric that we should take this one more job. This one job because even though there's a trans-Pacific partnership in the works, even though there's free trade bills before us that have taken all those jobs overseas, and we're not doing anything about that. We're supposed to come out here and stand up and get this one job to feed the people that have taken that over. Give them some cheap fuel over there while they have their manufacturing jobs. How about we start standing up and bringing jobs back over here, so we have something to build.

It's really kind of selling yourself out for a cheap fix. And I know that's the American way sometimes, but I don't buy into it. I don't believe that's the way we should be living our lives. I live in the Columbia Gorge so the coal trains do pass by.

I go out kayaking and windsurfing out there. And we can talk back and forth, but that stuff is real and climate change is coming. There is feedback that's coming that we can avert it the best we can or go head long into it.

Everybody that has kids here in the trades, you've got a choice to make. I don't buy it. I say we stand up against free trade and bring our jobs back here. That's where we're going to have jobs in Longview.

(Member of the audience shouting.)

Let's get some real jobs over here. That's all I have to say. I'll send the rest by mail.

EVENT HOST: Before the next speaker, I need to remind you of the ground rules. And that's a warning.

Submission Number: ***MBTL-SEPA-DEIS-0000947***

Received: 5/24/2016 5:24:59 PM
Commenter: Michael Nordhougen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

he trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. Cowlitz County has a chronically high unemployment rate. There are environmental impacts of building trades and longshore workers having to travel as far as the Port of Seattle for work on a daily basis, instead of going to a job at Millennium. Let’s keep our jobs local! I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Hi, my name's Tim Norgren. I work in the building trades, through Laborer's local 737 and I live in Stevenson, WA, just up the tracks from the proposed terminal. Stevenson's like a lot of railside towns (especially in the Gorge) in that most everything we have is near the tracks. In fact literally a stone's throw away from them you can find not only the Port offices, but the volunteer fire dept., which means that the only firefighting equipment we have could be preemptively annihilated if one of those 50+ mph trains should explode there, leaving us waiting for out-of -town help to even salvage burning buildings, let alone put out the oil itself, or salvage the water and beauty-dependent industries which keep our town afloat financially, or (!) to somehow replace our water supply!

But I'll leave that story to my neighbors. I'd like to tell you a story from the building trades. Not long ago I worked on an LNG pipe project south of Portland. It was done by union workers, who tend to be the most professional available. Nonetheless, stuff happens.

At a random point one day our foreman received a distress call. He grabbed up everyone he could and we jumped into his pickup and raced down the so-called “Right-of Way” to a Teamster who was struggling with a stuck valve on a fuel truck. Meanwhile diesel was pouring from the tanker into some farmer's field because the FERC issue kiddie pool wasn't enough to contain the flow.

We jumped out of the pickup and began to contain the diesel any way we could. We doubled up garbage bags and used personal ice chests to hold it. The pickup had a piggy-back tank with a pump, so we reversed the polarity and sucked up what would fit, likely mixing diesel with gas out of necessity. Meanwhile I did about a quarter mile sprint to get a pipe to extend the wrench with as the others continued to lose as much fuel into the field as they were unable to contain. When I made it back five or six of us and that cheater-pipe finally closed the valve. The FERC inspector wasn't there, so we dozed it under, dumped dry dirt over it and kept our mouths shut. If I get cancer at some future point it may likely be from eating food from a similar field. Alas such is karma (we reap what we sow).

On that same job I saw two more spills from blown hydraulic lines which were similarly dealt with. On one of them I believe the FERC inspector HAD seen it, but left us to clean it up (it may have been lunch time), and though we did soak up more of that than the others (we cleaned the dozer with “diapers” and soaked up the bigger puddles of fluid) we still just skimmed the top and covered it in the end.

This stuff happens on other projects too, for instance I worked with a paving company which got into synthetic pavement compounds, working 12-16 hour nights, and saw several small spills of heavily poisonous stuff go into the ground, as well as heard stories of bigger ones from those who'd been with the company longer. After the job was done I went to help with striping the road for that and their previous project (both on I-84) and to do the final “punch-list” work for both. One of our jobs was to dig several feet down with a mini excavator and haul out dirt contaminated by a fuel spill on the earlier job. Even though the dirt four or five feet down still wreaked of gas our DOT inspector called it good and we covered it up with fresh dirt and moved on. And if the DOT person on that job had been asleep in their car when that happened (as ours often was) it's very likely it wouldn't have been cleaned up much at all!

Please keep in mind these weren't sneering corporate criminals with calculated waste-dumping agendas I'm talking about. We're average working-class people trying to make an honest living and sometimes dealing with equipment failure or making honest mistakes. But people realize that if they get fired it's going to make it that much more difficult to pay their kids tuition, or even buy food, so they do the best they can and move on. And we're loyal to each other, so we “cover our own”.

Still, the damage is done, even when no one reports it. And it should be considered that such unreported or under-solved damage is not something that can be mitigated no matter how good something looks on paper. And by the way as any work site safety person will tell you, it ALWAYS looks better on paper than it does in reality. I actually happened upon a guy at work one day who had a BP sticker on his hardhat. I asked him if they were as reckless on all their jobs as they had been with the deepwater horizon spill and his reply was “Yes. Definitely.” It turns out he'd been their safety guy on a project. The company had asked him to look the other way or actually cover up several obvious violations to the point he'd been completely uncomfortable in the position and had quit! Given Tesoro's track record with such incidences as the explosions at the California refinery it's hard to see them being much better. Recently (in mid December of 2015) a mason I was assisting got a call to go to Tesoro's Anacortes refinery for emergency repairs she guessed to be from another explosion. Evidently those calls mean lots of overtime so she was excited. Good for her profits, bad for the dead and injured refinery workers.

I spoke with a co-worker in Port Westward, OR who is grateful to be alive after a crane lost control of a turbine engine as long as my house and “dropped it” into, and dented a nearby Bakken oil-tank-car! It didn't explode (by some miracle) so the safety crew gave their obligatory speeches and then quickly swept it under the rug. By the time I got there a few months later the only mention of it was in the hushed storytelling of a couple workers who'd been there and trusted me enough to share about it. It definitely wasn't something the company wanted anyone talking about! Again, things happen, and I don't wish that kind of stress or danger on anyone. But it's working people-Laborers, Longshore workers, and Railroaders, and everyone along the tracks, not CEO's who assume the immediate

physical risk, and it's entire communities **ALL ALONG THE EXPORT ROUTE** (Native, European and wildlife alike) who will sustain the increased risk to their resources and way of life. Please consider these risks as well. Thanks. Tim Norgren, (member of Laborers local 737) Stevenson, WA 98648

Submission Number: ***TRANS-PASCO-M1-00064***

Received: 6/2/2016 12:00:00 AM
Commenter: Tim Norgren
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Tim Norgren (phonetic) I'm laborer with the building trades out of Portland, although I live in Stevenson, Washington down there in the Gorge. I came out here from way down there today because I'm tired of the carrot on a stick that we need this one job. We need this quick fix because we don't have a lot of jobs going on. We need this one so we can take this cheap fuel and send it to Asia where most of the other jobs have been going.

We've got a lot of fear going on. Oh, my God somebody else is going to get this one job. The fact is we're not out there buying T-shirts and fighting to stop the trans-Pacific partnership. We're here for this one job.

A union by definition is a group of workers who gather together to improve the conditions of their labor. So for us pandering to some leader some little carrot on a stick is just stupid to me. I don't want to be a sucker like that. I want to actually stand up. And so I am. I am actively fighting the trans-Pacific partnership.

I think we should be putting back the Free Trade Agreement through NAFTA, and not giving them more resources to burn and unregulated factories because they don't have those regulations. That's why our jobs are going over there. We stood up as unions to fight for conditions and working guidelines.

Once we got them, the companies don't like that. They want to go where the resources are cheaper. We are a commodity. Labor is a commodity.

As far as coal dust, I live in the Gorge. I kayak. I windsurf around these lakes that finger in around the Columbia. On windy days, that's real. There's no talk about it. It just is.

And the other thing that people want to know -- climate change, I mean there's feedback that's real too. We have kids in the trades too, most of us...

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002852***

Received: 6/13/2016 2:48:01 PM
Commenter: David Normile
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000214***

Received: 5/10/2016 4:55:49 PM
Commenter: Anthony Norris
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. Cowlitz County has a surplus of industrial sites which impedes the development of the Reynolds Smelter site (due to cost of remediating and redeveloping a brownfield site). Millennium is taking on the redevelopment and can turn around a dilapidated, underutilized site. Grant the project its permits! Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

Submission Number: ***MBTL-SEPA-DEIS-0000748***

Received: 5/23/2016 1:54:54 PM
Commenter: Randall Norton
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and should be treated as such. An environmental review of this time and scope should not have been needed to redevelop an old smelter site. The Draft EIS is sufficient, it's time to move forward. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

Submission Number: ***TRANS-LV-Q3-00024***

Received: 5/24/2016 12:00:00 AM
Commenter: Sonya Norton
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

SPEAKER 24: My name is Sonya Norton. I am from Vancouver. I've observed the number of people in blue shirts from Millennium, and I would like to point out that while there may be jobs for most of them in the construction of the site, less than ten percent of them will have jobs once it is completed.

A year ago, a young man came forward to say that he had had considerable difficulty finding a job, though he was a certified, licensed union plumber or steamfitter, or something of that sort, and that he had only been able to put his children to bed at home 100 nights of that previous year.

I would like to point out to him and his fellows that while he will be able to do that for the next few years while the construction is proceeding, he will once again be out in the field looking for a job, possibly only having a hundred nights a year with his family.

It would be better for him to take up an occupation in the green energy field and then he and his family can choose to live together wherever they wish.

Comments Introduction – by Mike Nuess

Coal (and oil)
have delivered
enormous benefit to humanity.
Their energy services
have begun to free us from physical toil.
But they cannot deliver energy abundance for all.

Furthermore they now threaten to destroy us.
For the first time in human history
We face two
self-created,
imminent and urgent,
threats
to our survival on earth.
And one is today's scale
of fossil fuel combustion for energy,
the prime source
of the excess atmospheric carbon,
creating climate turbulence.
For years the pentagon has said it's our greatest security threat.
And now, cautious climate scientists are alarmed
as climate change grows much faster that they had predicted,
accelerating exponentially towards our destruction.

Fortunately we have an extraordinary solution
Counter-accelerating exponentially towards our salvation.
Solar and wind, efficiency, geothermal,
and a sprinkling of other
truly renewable energy technologies,
the only ones that can deliver
global energy abundance,
clean, stable environments
and durable peace.

Despite half-a-trillion-a-year
in taxpayer subsidies skewed against them,
they grow exponentially
in both production and capital investment,
cheaper now
and delivering more new generation capacity
than all fossil and nuclear generation combined.

We must take misplaced half-trillion
and instead subsidize the transition

of these coal workers
to better, cleaner, safer and more abundant jobs
in regionally-based renewable energy industries,
providing them income support,
health care, pension security
and training.

We must welcome
the more than $300 billion per year
in private renewables investment
and back it up with public investment.

We must immediately terminate
coal and oil generation.
They must stay in the ground.
They threaten our very survival.

We must pursue
our renewables solution
which now adds over 120 new GW per year—
roughly 30% of the U.S. coal fired production.
Full spectrum acceleration is required,
for we are now at that critical moment
when both the remarkable growth of efficiency and renewables
and a tsunami of new investment
enable the swiftest possible transition.
This must not be forestalled by continued fossil (or nuclear)
investments and subsidies.

Let's not make mistakes like this again:
In the last ¼ of the 20th Century
the Bonneville Power Administration
field-tested several
large wind generator designs
here in the Pacific Northwest.

Then during the 1980's
this R&D was dropped,
but the development of
modern wind power
continued in Europe.
Now just about 3 decades later
wind energy generation is
the world's fastest growing energy technology,
costing less than coal or any other EGT.

Had we then chosen more wisely
We would have developed
The entire value-adding
Wind-electric production chain
here at home,
providing new jobs for
an indigenous industry
providing coal workers
a smoother transition
than the one that must happen now.

Instead we have had to export dollars
To import wind towers and blades from Denmark.

Hopefully, this time,
short-term planning horizons
and politics
will not preclude
a science-based decision.

The Ruthless Recklessness of Initiatives like the Oil and Coal-by-Rail Export Terminals in the Pacific Northwest

By Mike Nuess



The public comment period for the largest proposed oil-by-rail project in the Northwest U.S. has closed and now Washington State's EFSEC must recommend a decision to Governor Jay Inslee. Tesoro-Savage's proposal is to ship 360,000 barrels of crude oil per day—four trains, each 1.5 miles long—through urban areas and along the Columbia River to the Port of Vancouver.

Another is Millennium Bulk's proposal for a coal export facility in Longview, Washington, the largest proposed coal-by-rail project in the Northwest. Washington State's Draft Environmental Impact Statement was scheduled for release on April 30, 2016 with a public comment period to follow.

These are but two of several initiatives for the extraction, transportation and export of coal, oil and gas from the western regions of the U.S. and Canada. They possess enormous inertial momentum and their cumulative effect would be disastrous at all levels—local, regional, national and global.

However, popular resistance grows fierce as citizens become increasingly aware of the intricate and extensive scope of the issue—again at all levels. And this understanding of both the stark potential for disaster (potentially species-terminal at the global level) and the exquisitely beneficial-to-all,

immediately available-to-all alternative can and must lead to a correction of course toward the right solution.

> *We are now at that moment when both the remarkable growth of efficiency and renewables and a tsunami of new investment enable the swiftest possible transition, which must not be forestalled by continued fossil or nuclear investments and subsidies.*

I sought to contribute to that understanding by submitting the following comments to Washington State's EFSEC in January 2016 and presented them in the Mental Mouthfuls prose format so successfully developed by Buckminster Fuller. Here they are, slightly updated for the next round of comments:

Only if we expand
the boundaries of our scoping
can we simultaneously
solve this *survival-critical* matrix
of inter-related issues.

Only by thinking
comprehensively enough
to integrate all relevant
scientifically redemonstrable
evidence,
can we discover
we possess
a vastly superior alternative
to extracting, transporting and combusting
coal, oil, natural gas and uranium
for energy-production technologies.

Our exquisite alternative
mitigates and virtually *eliminates*
adverse fossil and nuclear impacts;
from the most serious
—either climate turbulence from
species-threatening anthropogenic carbon
or catastrophic releases of ionizing radiation—
to the more local and regional impacts of pollution

by mercury, lead, arsenic, sulphur dioxide, coal dust;
oil tanker leaks or explosions
in urban or sensitive environmental areas; etc.

Further, our alternative *mitigates*
the extremely dangerous impact of
the grievous, evermore foolish forestalling
of the *swift* and *necessary* deployment
of this *proven* and powerful alternative

—the *only* comprehensively viable alternative—

which is to deploy
an elegant mix
of efficiency and renewables
to achieve
sustainable energy abundance,
resilient economies with abundant jobs,
safe and healthy environments,
regenerative ecosystems
and durable peace.

Only efficiency and renewables
can mitigate and virtually eliminate
fossil and nuclear energy's
now reckless, ruthless, destructive,
potentially species-terminal
impacts
of irreversible climate turbulence,
nuclear waste and weapons proliferation,
costly and unhealthy pollution,
ecosystems collapse, and
increasingly intense conflicts over
ever-scarcer energy resources. (5)

Efficiency and renewables
are *proven*
to be safer and cleaner
more durable, flexible and resilient
more flexibly scalable,

cheaper and more jobs intensive,
than coal, oil, gas or nuclear;
and capable of delivering
universal energy abundance.

Germany,
Europe's industrial heartland,
a renewables leader,
now has more solar workers
than the U.S. has steel workers.

There are now more jobs per unit of delivered energy
and more people employed in solar, wind and efficiency
than in the fossil and nuclear industries.

"The world is now
adding more capacity
from renewable power each year
than coal, natural gas, and oil combined." (6)

There's no going back.
But how fast can we go forward?
Since 1970 U.S. investments
in energy *efficiency* have
cut energy use per dollar of GNP
by well over 50%,
while increasing associated comforts and benefits:
things like warmer houses and safer cars. (4)
Today it's an engineering certainty
that we can more than double
our efficiency *again* by 2050. (2)

We've also been deploying
Ever-better renewable energy *generation*.

Back in 2007 the U.S. added more wind capacity
than it had added in coal-fired capacity
over the previous 5 years.

For the 4 years prior to 2013

half the world's
new generating capacity
was clean renewables.
Also half in 2014 and 70% in 2015,
despite the one-sided $490 billion
in annual fossil fuel subsidies.

Installed wind capacity in the U.S.
surpassed 60 GW in 2013,
adding more than that of over 50
average nuclear power plants,
or about 90 average coal fired power plants.
Allowing for conventionally assumed capacity factors
(thereby ignoring the fact that mixed types of
dispersed, distributed and forecast-able
renewables systems
will have much higher capacity factors),
this represents more generating power than
44 coal-fired power plants
or 11 nuclear power plants,
avoids emitting as much carbon dioxide as
taking 14 million cars off the road,
while saving 30 billion gallons of water a year,
costing less and delivering more jobs.
Installed wind capacity keeps growing:
to over 74 GW by the end of 2015.

Way back in the 20th Century
Buckminster Fuller (RBF)—
the Leonardo da Vinci of our times—
assured us we could
transition to efficiency and renewables
in just a decade.

This trend can and must continue
its swift acceleration.
Evolutionary economist Hazel Henderson
speaks encouragingly
of a *wall* of private investment
now surging toward

sustainable efficiency and renewables (7)
as they are safer,
lower risk investments
with quicker return.

In 2010, global renewable energy
(excluding large hydro)
got $151 billion of private investment,
surging to $270 billion in 2014
and $329 billion in 2015 (6)
and surpassed the total installed capacity of nuclear power
after adding about 120 GW in just one year.
And now in 2016
our clean energy investments are
“seeing twice as much global funding
as fossil fuels.” (8)

Most significantly,
the world can now add
Upwards of 120 GW of renewable wind and solar *each* year,
roughly 30% of U.S. coal generation capacity,
or roughly the nameplate capacity of all 104 U.S. nuclear power plants.
Each year, this annual delivery capacity grows swiftly
—as it must.

The first five references below offer
sufficiently comprehensive and detailed
scientific studies,
two for the Pentagon (4,5),
for clarifying the physical and engineering
certainty and necessity of this alternative:

Scientific American published a study
detailing how wind, water and solar technologies
could provide 100 percent of the world's energy by 2030,
eliminating *all* fossil fuels. (2)

A *Stanford University* study
ranked energy systems according to their impacts
on global warming, pollution, water supply

and other *so-called* economic externalities,
concluding that the very *best* options were
wind, solar, geothermal
and other clean renewables;
while coal (even *with* carbon capture)
and nuclear
ranked poorly. (3)

In 2011, a comprehensive and detailed
technical and economic
blueprint for transition
demonstrated available savings of $5 trillion
over business as usual
by deploying an elegant mix
of efficiency and renewables,
for all uses,
to *completely* phase out coal, oil and nuclear by 2050,
while growing our economy more than 150%,
and reducing our carbon footprint by about 85%. (1)

Given this
expanded and comprehensive context,
it is evident
that extracting and consuming
fossil and nuclear resources
for today's energy production systems
is extremely harmful
possibly terminal for humanity,
and represents merely the utter selfishness
of far less than a tenth of a percent of humans
who, with the power of very deep pockets,
act in their *own* short-term interest,
as Adam Smith once observed,
"*regardless* of the impact on everyone else."

Men and women currently working
in fossil and nuclear energy technologies,
are seductively surrounded by odes to their value
from these remote, ruthless profiteers—
the Tesoros, Enrons and Exxons,

the Kochs, Peabodys and JPMorgans, etc.—
who deceitfully seek their fealty
while readily exporting their jobs,
often to countries
where U.S. backed oligarchies
seek entry into the billionaire class
by violently suppressing
environmental and labor movements:
thereby maintaining
a “good business climate”
for their foreign investors. (9)

These men and women currently working
in fossil and nuclear energy technologies
can expect to find superior opportunities
in the emerging renewables-based economy:
jobs that are more abundant, stable, local and safer.
And, an informed popular demand
for economic justice
can streamline their personal transitions
by protecting their homes and pensions,
providing training and relocation services;
and thereby deploying
reliable and lucrative social investments
into the now emerging
renewables-based economy—
leading swiftly to
abundance for all
at the expense of none.

It is clear and certain now:
allowing Texas petroleum refiner Tesoro’s
Tesoro-Savage terminal,
Hedge-fund owned Lighthouse Resources Inc’s
Millenium Bulk terminal,
and other terminals, extractions and power plants
would be reckless foolishness,
indicating that we humans
may yet prove ourselves to be
no wiser than

lemmings headed for the cliff,
failing to see
“it is now highly feasible
to take care of everybody on Earth
at a higher standard of living
than any have ever known.
It no longer has to be you or me.
Selfishness is unnecessary.
War is obsolete.
It is a mater of converting
the high technology
from weaponry to livingry.” (RBF)

Please evaluate this mitigating alternative
The *only* one that can deliver
abundance, safety and security
to all humans.
If you do, I’m confident
you’ll do all you can
to leave it in the ground.

Linked References:

(1) Lovins, A.B. & Rocky Mountain Institute, ***Reinventing Fire***, Chelsa Green Publishing, VT, September 2011. http://www.rmi.org/ReinventingFire

(2) Jacobson, Mark Z. and Delucchi, Mark A. ***A Plan to Power 100 Percent of the Planet with Renewables***, Scientific American Magazine, November 2009. http://www.scientificamerican.com/article.cfm?id=a-path-to-sustainable-energy-by-2030

(3) Jacobson, Mark Z. ***Review of Solutions to Global Warming, Air Pollution, and Energy Security***. Department of Civil and Environmental Engineering, Stanford University, Stanford, California, June 2008. http://www.solaripedia.com/files/398.pdf

(4) Lovins, Amory B., etal. ***Winning the Oil Endgame, Innovation for Profits, Jobs and Security***. Snowmass, Colorado: Rocky

Mountain Institute, 2005. http://www.rmi.org/Knowledge-Center/Library/E04-07_WinningTheOilEndgame

(5) Lovins, A.B. & L.H., ***Brittle Power: Energy Strategy for National Security***, Brick House, Andover MA, 1981. http://www.rmi.org/Knowledge-Center/Library/S82-03_BrittlePowerEnergyStrategy

(6) Frankfort School –United Nations Environment Program, ***Global Trends in Renewable Energy Investment 2015,*** http://fs-unep-centre.org/publications/global-trends-renewable-energy-investment-2015 and Bloomberg Business, **As Oil Crashed Renewables Attract Record $329 Billion,** http://www.bloomberg.com/news/articles/2016-01-14/renewables-drew-record-329-billion-in-year-oil-prices-crashed

(7) Hazel Henderson, ***It's Our Money with Ellen Brown – Is Your Money Better Off in a Mattress?,*** http://prn.fm/its-our-money-with-ellen-brown-is-your-money-better-off-in-a-mattress-11-25-15/

(8) Tom Randall, ***Wind and Solar Are Crushing Fossil Fuels – Record clean energy investment outpaces gas and coal 2 to 1.*** April 6, 2016. http://www.bloomberg.com/news/articles/2016-04-06/wind-and-solar-are-crushing-fossil-fuels

(9) Greg Grandin, ***The Clinton-Backed Honduran Regime Is Picking Off Indigenous Leaders.*** March 3, 2016. http://www.thenation.com/article/the-clinton-backed-honduran-regime-is-picking-off-indigenous-leaders/

Mike Nuess is an educational consultant, primarily in the fields of energy and building science. He is an advocate with the *Peace & Justice Action League of Spokane*, and the author of the book, *General Plenty—Always and Only the Path to Peace* .... "probably one of the best books ever written on the political and human task of achieving peace and prosperity," according to *West By Northwest Online Magazine*. *General Plenty* is available at Amazon.com or via his website where additional articles are available as well: http://www.teleologics.org.

Submission Number: ***MBTL-SEPA-DEIS-0000868***

Received: 5/24/2016 2:32:52 PM
Commenter: Fred Nussbaum
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Do not accept this proposal. It will produce harmful environmental effects on both nature and humans. It flagrantly violates federal and state policies.

Submission Number: ***MBTL-SEPA-DEIS-0000202***

Received: 5/10/2016 4:42:05 PM
Commenter: Kevin O
Organization: Kevinophoto
State: Hawaii

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

By allowing this company to literally blow up and drill our land, transport and burn toxic materials... Wait you were actually considering that? Doesn't it sound like something out of a movie. Remember what you sided with when someone proposed to destroy our planet. If you have such little honor to go home and tell you family, especially your kids, "Today, I let a big company bowldoze tree that kids your age in Washington. Then I let then dig out toxic materials, then drive then by uncontained sickening people like you and I. Finally, I shipped them to Asia to be burned, which sickens and kills people over there". If you can say that, you probably shouldn't be apart of our planet anymore. If you can't stand up for your family and do something to provide for generations to come.

Submission Number: ***MBTL-SEPA-DEIS-0000106***

Received: 5/5/2016 9:51:57 PM
Commenter: Kathy Oberg
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State’s role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible. Sincerely, Kathy Oberg

O'Bryan, Kristy (0760)

Submission Number: ***MBTL-SEPA-DEIS-0000760***

Received: 5/23/2016 2:05:07 PM
Commenter: Kristy O'Bryan
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied â€" get on with it already. Thank you for reviewing my comments today.

O'Byrne, Ernie (1761)

CLIMATE WRITERS
86813 CENTRAL RD
EUGENE OR 97402

RECEIVED
MAY 20 2016

Millennium Bulk Terminals EIS Comment

Dear Sir or Madam:

We are writing to ask that no permits be granted to Millenium for the proposed export terminal in Longview, WA.

Such a terminal would contribute significantly to carbon emissions and global warming prolonging our dependence on fossil fuels.

Also, the effects would decrease snowpack change rainfall patterns, raise river temperatures affecting fishes, etc.

Sincerely,

Ernest O'Byrne
Jere C. Rosemeyer
Kate Gessel
M. Gessel
Evelyn Haas
M. O'Byrne

Ochs, Kathleen (2189)

Submission Number: ***MBTL-SEPA-DEIS-0002189***

Received: 6/7/2016 7:08:41 PM
Commenter: Kathleen Ochs
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study should move forward in a timely manner. Please allow me to provide my comments in regards to the draft EIS. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! Millennium Bulk Terminals EIS should be thorough but held to the same standards as any other port proposal. We need to do everything we can to strengthen and grow the economy of Washington and the west in general. The project proposed will do just that. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001512***

Received: 5/31/2016 2:32:44 PM
Commenter: Richard Ochs
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. What most folks in Seattle tend to forget is that not everyone in Washington lives in Puget Sound. Not all of us work in the high-tech industry, and we still earn good livings as farmers, working at ports or in manufacturing. We make things, harvest and develop natural resources, feed our community and help facilitate trade in our great state. And we need more jobs like this â€" especially in Cowlitz County where our unemployment rate is 8 percent. Millennium Bulk Terminals can bring great jobs to our county â€" not to mention the much-needed tax revenues. Let’s not forget about how much time, effort and money Millennium has spent to clean up the port. Frankly, it was an environmental blight on our community, but now it will be a critical link for expanding trade for Southwest Washington. Again, having good jobs and protecting the environment can go hand in hand. Thank you for accepting comments for this important project. Please make the necessary steps to move forward on its approval as soon as possible. Sincerely, Richard E Ochs dickochs@gmail.com 99126

Submission Number: ***MBTL-SEPA-DEIS-0001869***

Received: 6/2/2016 6:20:36 PM
Commenter: Michael Ockinga
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. What most folks in Seattle tend to forget is that not everyone in Washington lives in Puget Sound. Not all of us work in the high-tech industry, and we still earn good livings as farmers, working at ports or in manufacturing. We make things, harvest and develop natural resources, feed our community and help facilitate trade in our great state. And we need more jobs like this â€" especially in Cowlitz County where our unemployment rate is 8 percent. Millennium Bulk Terminals can bring great jobs to our county â€" not to mention the much-needed tax revenues. Let’s not forget about how much time, effort and money Millennium has spent to clean up the port. Frankly, it was an environmental blight on our community, but now it will be a critical link for expanding trade for Southwest Washington. Again, having good jobs and protecting the environment can go hand in hand. We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don’t hold them up any longer.

Submission Number: ***MBTL-SEPA-DEIS-0000510***

Received: 5/19/2016 5:12:38 PM
Commenter: Tim O'Connell
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State's role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. The draft EIS to evaluate Millennium Bulk Terminals proposed Longview project should be kept within reason. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with the process in a timely manner. It's the fair thing to do.

Submission Number: ***TRANS-LV-Q3-00043***

Received: 5/24/2016 12:00:00 AM
Commenter: Jenny O'Connor
Organization: Climate Action Coalition
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Jenny O'Connor, and I've been working with Climate Action Coalition and some other groups for a while now. So I'm opposed to the building of the terminal, or, you know, building of the project.

And I just wanted to cite something that my husband, who's a mechanical engineer sent to me. It's an article that says, "GOP States Are Benefiting From Shift to Wind and Solar Energy," and it's from the Associated Press. It's by Michael Biesecker, and he said, "Wind turbines and solar panels accounted for more than two-thirds of all new electric generation capacity added to the nation's grade in 2015 according to the recent analysis by the U.S. Department of Energy. The remaining third was largely new power plants fueled by natural gas which has become cheap and plentiful as a result of fracking. So it was the second straight year U.S. investments and renewal projects have outpaced that of fossil fuels."

So I guess my point is that, you know, we do, we have to find jobs for people. But this article is saying that, you know, the jobs are shifting. So I guess, you know, my point is, okay, what can we do when our regions bring more of those kind of jobs here.

So that's kind of what I'm looking at. Because I listen to all of those people talk about jobs and my heart goes out to them. So it's like, you know, I'm a problem solver. That's kind of where I'm at.

So, I'm on the record. No build alternative, and let's get more of those renewable jobs out here.

Submission Number: ***MBTL-SEPA-DEIS-0002220***

Received: 6/7/2016 7:33:41 PM
Commenter: Mike O'Donnell
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

In a time that has included seeing neighbors and friends out of work and under-employed, we need to encourage economic development. In my opinion, that cannot happen soon enough. That is why I am writing today. Media coverage would have us believe that transporting coal by rail through our state is unprecedented, it's not. We've transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002526***

Received: 6/11/2016 12:41:25 PM
Commenter: John Oetinger
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am opposed to anything that makes it easier to expand the coal industry, including the 4 proposed coal export terminals

Submission Number: ***MBTL-SEPA-DEIS-0002166***

Received: 6/7/2016 6:50:32 PM
Commenter: Sandra Ogden
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During CX the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001708***

Received: 5/31/2016 7:09:39 PM
Commenter: Shane Ogle
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study should move forward in a timely manner. Please allow me to provide my comments in regards to the draft EIS. In regards to coal dust & human health impacts: Please refer to the American Lung Association's report on state / county rankings. First please note that the incidence of pediatric and adult asthma for Cowlitz Co is 9.1%, Clark Co. is 9.0%, and Yakima Co is 8.9%. Then compare this same statistic to communities where coal is produced or shipped through such as Campbell Co WY at 9.0%, Box Butte Co, NE (Alliance) 6.96%, Lincoln Co NE (North Platte) 6.98%, or St. Louis Co MO 7.68%. Further, the ALA ranking for 24 hr particulate matter in Campbell Co WY scores a grade of B, as compared to Clark Co WA at F and Yakima Co WA at F. The evidence is obvious, coal production and transportation is not causing a health problem, but it can act as a remedy to an economic downturn. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium's proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0002077***

Received: 6/7/2016 4:37:37 PM
Commenter: Todd O'Hair
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. Montana would be the likely supplier of coal through the terminal making this a win-win situation for both Montana and Washington. Additionally, the Crow Indian Reservation has reserves of high quality coal that is high demand in Asian markets like Japan and South Korea. The Crow currently experience high unemployment and low per capita income, making this market opportunity critical to their future. Asian countries continue to build coal fired electrical generating facilities despite current low U.S. exports of coal. This fact suggests that Asia will be burning coal regardless of country of origin and coal through the MBT terminal would not create a market for coal, but merely serve existing demand.

RECEIVED
MAY 25 2016

Millennium Bulk Terminals, Longview: DEIS on Greenhouse Gas Emissions and Climate Change

My name is Dr. Kelly O'Hanley. As an obstetrician gynecologist with a degree in public health, I have worked over 30 years in 40 countries to protect the lives of mothers and babies. I have helped teach the next generation of doctors at Harvard and Stanford universities.

The DEIS uses misleading and obsolete information. The DEIS (page 5.8-2) states the warming potential of methane to be 25 times that of CO2. It cites the Environmental Protection Agency and the International Panel Climate Change as key sources (page 5.8-5). But note: the Environmental Protection Agency's actual language in 2015 is "more than 25X that of CO2"[1]. [This is like saying, "Tucson, Arizona (with a population just over 1 million) and Tokyo, Japan (with a population of about 38 million) both have populations of more than 1 million".] As for the International Panel Climate Change, in 2015, it states that methane is 34 times stronger a heat-trapping gas than CO2 over a 100-year time scale.[2]

The DEIS's 100-year timeframe for impacts of climate change is too long. The International Panel Climate Change states that "The choice of time horizon is a value judgment." Applying the more relevant 20-year time frame, the International Panel Climate Change states that greenhouse gas impact of methane is 86 times that of CO2. This is a far cry from the 25 times figure used in the DEIS.

For the reasons cited, the DEIS should be deemed as inadequate. Therefore, the "No Action" alternative should be chosen.

Kelly O'Hanley, MD, MPH
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503-880-8844

[1] https://yosemite.epa.gov/opa/admpress.nsf/0/E5F2425E2E668A2B85257EA5005176FA
[2] http://www.climatechange2013.org/images/uploads/WGIAR5_WGI-12Doc2b_FinalDraft_All.pdf

Millennium Bulk Terminals, Longview DEIS: Greenhouse Gas Emissions and Climate Change – Impact on Human Health

My name is Dr. Kelly O'Hanley. As an obstetrician gynecologist with a degree in public health, I have worked over 30 years in 40 countries to protect the lives of mothers and babies. I have helped teach the next generation of doctors at Harvard and Stanford universities.

The DEIS devotes pages to calculating increases in metric tons of CO2 but it is silent on the resultant impact of climate change on human health. This is quite an omission. It's equivalent to calculating the tonnage of nuclear bombs dropped during WWII but failing to comment on the loss of life in Hiroshima and Nagasaki.

What could be the impact on Cowlitz County and Washington residents from forest fires, smoke, injury, death and dislocation?

What are the impacts from increased heat, higher ozone levels and degraded air quality? How will this impact pediatric populations and adults over 65? Those with pre-existing diseases like asthma, bronchitis, COPD?

What will be the health impacts of severe weather, including heavy rain, flooding, wind storms and landslides?

What will be the impacts from increasing rates of vector-borne diseases like West Nile Virus, Rocky Mountain Spotted Fever, plague, dengue fever, tularemia and Lyme disease? Or from diarrheal infections such as Salmonella and Campylobacter?

Where is information about food security? Will there be disproportionate adverse effects on low income communities and communities of color? If so, what will they be?

Due to the lack of a Human Impact Assessment, the DEIS should be deemed inadequate and the "No Action Alternative" should be adopted. Subsequently, for the sake of human survival, all future proposals to transport, store, and burn coal should be rejected as many times and in as many places as is necessary to halt the mad dash toward climate chaos.

Kelly O'Hanley, 6134 NE Alameda St., Portland, OR 97213 503-880-8844 kohanley@gmail.com

Submission Number: ***TRANS-LV-M2-00027***

Received: 5/24/2016 12:00:00 AM
Commenter: Kelly O'Hanley
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Dr. Kelly O'Hanley, Portland, Oregon. As an obstetrician/gynecologist with a degree in public health, I've worked over 30 years in 40 countries to protect the lives of mothers and babies. I've helped teach the next generation of doctors at Harvard and Stanford Universities.

The DEIS devotes pages to calculating increases in metric tons of CO2, but it is silent on the result impact of climate change on human health. This is quite an omission. It's equivalent to calculating the tonnage of nuclear bombs dropped during WWII, but failing to comment on the loss of lives at Hiroshima and Nagasaki.

What could be the impacts on Cowlitz County and Washington residents from forest fires, smoke, injury, death, and dislocation? What are the impacts from increased heat, higher ozone levels, and degraded air quality? How will this impact pediatric populations and adults over 65, those with pre-existing diseases like asthma, bronchitis and COPD?

What will be the health impacts of severe weather including heavy rain, flooding, wind storms, and landslides? What will be the impact from increasing rates of infectious diseases like West Nile Virus, Rocky Mountain Spotted Fever? How about diarrheal diseases like salmonella and campylobacter?

Where is information about food security? Will there be disproportionate adverse effects on low income communities? If so, what will they be? Due to the lack of a human impact assessment, the DEIS should be determined inadequate and no action alternative should be adopted. Subsequently, for the sake of human survival, all future proposals, say no to them.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000708***

Received: 5/23/2016 12:58:46 PM
Commenter: Franque O'Hara
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete â€" it's time for progress. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. I'm certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

I would like to address several aspects of the Draft Environmental Impact Statement (DEIS) for the Millenium Bulk Terminal Coal Export Facility Proposal that relate to public health. Overall, the DEIS lacks detail and overall substance in regards to the human health impacts of the proposed terminal. A comprehensive Health Impact Statement should be performed in order to give proper consideration to human health in this process

The air quality impact summary in 5.7.5 of the DEIS states "Overall the impacts of PM10 and PM2.5 emissions from proposed-action related rail transport of coal would not be significant because emissions would be below applicable federal standards." This is a misleading statement. While it is true that PM10 and PM2.5 emissions would fall below federal standards, that does not mean that there would be no negative health impacts. In fact, according to the World Health Organization (WHO) "Small particulate pollution have health impacts even at very low concentrations – indeed no threshold has been identified below which no damage to health is observed." [1]

The human health impacts of particulate matter include cancer, cardiovascular, cerebrovascular and respiratory disease. These health consequences accumulate with increasing exposure. There is a close quantitative correlation between exposure and negative health impacts (morbidity and mortality). Comparing the guidelines used in the DEIS (which are from the U.S. National Ambient Air Quality Standards and Washington State Air Quality standards – from here on out I will simply refer to the DEIS reference standards as NAAQS) against the WHO guidelines we find that the WHO guidelines are lower and more restrictive -- in some cases (particularly PM10) they are considerably lower. The following table shows the comparison WHO guidelines with NAAQS:

WHO Particulate Matter Exposure Guideline values [2]

(NAAQS/Washington State Standards show in parentheses for comparison)

$PM_{2.5}$

Annual mean - 10 μg/m^3 -- (NAAQS 12 μg/m^3)

24-hour mean - 25 μg/m^3 -- (NAAQS 35 μg/m^3)

PM_{10}

Annual mean - 20 μg/m^3 (Not included in the DEIS)

24-hour mean - 50 μg/m^3 -- (NAAQS 150 μg/m^3)

Below are examples of expected emissions from project operations with comparison to WHO Air Quality Guidelines:

Table 5.6-6. Maximum Modeled Concentrations from the Operation of the Coal Export Terminal shows total predicted concentrations of PM10 (24 hour average) of 80mcg/m3. This exceeds the WHO guideline of 50mcg/m3.

Table 5.6-7. Project Area Concentration from Operations (All Sources) shows total predicted concentrations of PM2.5 (24 hour average) of 29.8mcg/m3. While under the NAAQS 35mcg/m3 threshold it is over the WHO standard of 25mcg/m3.

Total predicted concentrations of PM10 (24-hour average) would be 108mcg/m3, which is over twice the WHO threshold of 50mcg/m3.

Table 5.7-6. Estimated Maximum PM10 and PM2.5 Concentrations—BNSF Main Line, Cowlitz County shows the total concentration of PM10 at 50ft and 100ft to be 58mcg/m3 and 51mcg/m3 respectively, both of which exceed the WHO guideline of 50mcg/m3. 24-hour average of PM2.5 at 50 feet is 25.5mcg/m3 which is above the WHO guideline of 25mcg/m3, while at 100feet is 24.8, just below the WHO standard.

Table 5.7-9. Estimated Maximum PM10 and PM2.5 Concentrations 100 Feet From Rail Line— BNSF Main Line, Washington State (Outside Cowlitz County) shows the total concentration of PM2.5 (annual average) to be 9.8mcg/m3 which is just under the WHO guideline of 10mcg/m3.
The 24-hour average of PM2.5 is 27mcg/m3 which exceeds the WHO guideline of 25mcg/m3.
The PM10 (24-hour average) is 125mcg/m3 which is two and a half times the WHO guideline of 50mcg/m3.

Of particular interest in Table 5.7-9 is that baseline PM10(24 hour average) is 101mcg/m3 which is already twice the level established by the WHO. Especially in light of data summarized in the WHO Air Quality Guidelines "reducing *annual* average particulate matter (PM_{10}) concentrations from levels of 70 μg/m^3, common in many developing cities, to the WHO guideline level of 20 μg/m^3, could reduce air pollution-related deaths by around 15%. However, even in the European Union, where PM concentrations in many cities do comply with Guideline levels, it is estimated that average life expectancy is 8.6 months lower than it would otherwise be, due to PM exposures from human sources."[3,4,5,6] (Note that the above numbers refer to *annual* PM10 concentrations which were not measured/modeled/included in this DEIS).

Rather than the reassuring conclusions of the DEIS, a more fitting conclusion would be: Particulate matter and coal dust emissions from the Millenium Bulk Terminal Project are expected to fall under NAAQS and Washington State Standards, however they will have negative health impacts. This study identified places in Washington State, especially near the railroad tracks, where current air quality is already unacceptably poor, exceeding WHO guidelines by two times in at least one case. Improvements in ambient air quality in these places can be expected to have considerable positive health impacts, while the affect of this project would be, in all instances, increases of particulate matter which has negative health impacts even at very low doses.

Another area warranting comment is the way in which the Jaffe study [7] was interpreted in this document. Using direct air quality monitoring and video surveillance this study found that coal trains emitted 2 times the PM2.5 than freight trains. The most interesting finding from the study was the existence of "super-dusters," which are defined as coal trains which were observed to have a large, visible plume of coal dust coming off of them and correspondingly high PM2.5 emissions. This accounted for the huge range of PM2.5 measurements from coal

trains (the average peak delta PM 2.5 was 21mcg/m3 while the highest was 232mcg/m3– which is 10 times greater than the mean). Figure 4 in the study [7]shows the relationship between PM2.5 enhancement and effective wind speed over the top of the train cars. We can see that all the superduster events happened with over the top wind speeds greater than 80km/hr and that among the 4 superdusters higher PM2.5 enhancements were seen with higher speeds. An incomplete understanding of this superduster phenomenon(and grounds for further study) is demonstrated in data which show that there were many trains with effective wind speeds higher than 80km/hr and only 4 ended up being superdusters. Additionally at least 4 trains had higher effective winds speeds than the fastest (and dustiest) superduster, yet they had PM2.5 enhancements that were very close to the mean. Perhaps the most important conclusion to take from this study is that a minority of trains have massively greater coal dust emissions and the reasons certain trains performed so poorly in terms of coal dust emissions has not been definitively studied and addressed.

Which brings up the issue of air quality assessments based on modeling with insufficient actual monitoring. In section 5.6.4.2 the following statement appears:
"The only available local (Cowlitz county near project site) air pollutant monitoring is for PM2.5, at a station approximately 1.5 miles east of the project area. The monitoring data show that PM2.5 levels are well within the PM2.5 air quality standards. **Although no other monitoring data are available**, concentrations of other criteria air pollutants in the study area also are expected to be well within air quality standards."
The city of Portland and Oregon Department of Environmental Quality recently discovered the risk of underestimating air pollution when modeling of air quality is based on a small number of actual monitoring stations. A study by the US Forest service used moss bio-indicators as a novel air quality monitoring strategy finding very high levels of cadmium (49 times higher than Oregon air quality standards) next to several stained glass manufacturers[8]. These very high toxic emissions were not predicted based on prior, inadequate air quality monitoring. The data from only a few stations was available and assumptions in modeling led to significant errors. The assumption that "concentration of other criteria air pollutants in the study area also are expected to be well within air quality standards" does not rise to the level of rigor demanded in instances of protecting public health.

My reading of the conclusion of this DEIS in regards to human health is that there are not significant public health risk to cause concern from this project. In sharp contrast, reading this DEIS with a public health lens raises significant concerns not only about the proposed project, but also about existing conditions. Rather than support moving forward with the MBT project the data in this study should spark an effort to reduce and eventually eliminate any coal traffic as well as address reducing toxic emissions from all diesel locomotives and vehicles.

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503 367 5859

References:

1. WHO Fact sheet N°313 - Ambient (outdoor) Air Quality and Health including links and references to: WHO Air Quality Guidelines, Air Pollution and Cancer IARC's 2013 Assessment, Review of Evidence on the Health Aspects of Air Pollution (REVIHAAP) - http://www.who.int/mediacentre/factsheets/fs313/en/
2. WHO Air quality guidelines for particulate matter, ozone, nitrogen dioxide and sulfur dioxide Global update 2005 - http://apps.who.int/iris/bitstream/10665/69477/1/WHO_SDE_PHE_OEH_06.02_eng.pdf
3. Pope CA et al. (1995). Particulate air pollution as a predictor of mortality in a prospective study of U.S. adults. American Journal of Respiratory and Critical Care Medicine, 151:669– 674.
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7. Jaffe, et al (2015) *Diesel particulate matter and coal dust from trains in the Columbia River Gorge, Washington State, USA*, Atmospheric Pollution Research
8. Donovan, Geoffrey H, et al. 2016. Using an epiphytic moss to identify previously unknown sources of atmospheric cadmium pollution. Science of The Total Environment. 559: 84-93

Submission Number: ***MBTL-SEPA-DEIS-0000201***

Received: 5/10/2016 4:40:48 PM
Commenter: Roger Oldemar
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for this opportunity to voice my support of Millennium Bulk Terminals - Longview project. This port will benefit the economy of the region, and that of the nation. The economy depends on trade. It creates jobs working the railroads and ships, loading cargo at the ports, growing crops for export, and building the infrastructure necessary to support a trade-based economy. However, trade depends on permitting approval to construct this infrastructure. If the federal, state, or local government apply different permitting standards to projects exporting coal, they are creating a dangerous precedent that will make it hard to build new infrastructure needed to export other goods, like wheat or manufactured products. The environmental groups have a long history of challenging trade based projects in the northwest, such as Columbia river dredging, new rail facilities and/or export terminals. Governments shouldn’t threaten trade or the jobs that depend on it. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0000353***

Received: 5/11/2016 5:27:14 PM
Commenter: Lisa Oldendorp
Organization: MoveOn.org
State: New York

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

We need to leave the coal in the ground! Exporting coal endangers the health of the miners, other coal workers, and the surrounding communities. Coal dust is a highly toxic, proven carcinogen. Adding more coal dust to the atmosphere is a dangerous health hazard. In addition, exporting our coal to other countries where it is burned is simply adding to the carbon footprint of the earth, which is exactly the opposite of what we should be doing to reverse climate change and ensure the health and welfare of present and future generations. Do what is right for the people of the communities surrounding the proposed marine terminal, as well as what is right for future generations. Do not approve this marine coal terminal.

Submission Number: ***TRANS-LV-M2-00110***

Received: 5/24/2016 12:00:00 AM
Commenter: Michael O'Leary
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. Through a fortunate thing I'm going to extend upon her marks. Thank you for raising those issues. They are very near and dear to my heart. My name is Michael O'Leary (phonetic). I live in Portland.

And I do want to say I'm disappointed that you're not holding a hearing closer to larger metropolitan area. I think it's mathematically odd to have a hearing in Spokane and Pasco, but not in Clark County, not in the Gorge.

I think those people deserve to be heard and not have to drive three or four hours like the Warm Springs folks did today, like the guy from Eugene. That's a heroic leap for the waterways that they're defending.

But I am lucky. My grandfather taught me how to fish when I was a little kid. In February, I caught my first steelhead of the year. And Thursday I caught my first spring salmon of the year. Those fish get shared to my apartment neighbors, to my friends and family, and eaten by me, and I enjoy very much.

So it's a sustainable economy and good for the heart. And there's thousands of jobs attached to that. You can walk along the Columbia River Gorge, windsurfing capital of the world and find where coal dust falls off the tracks.

It's probably not at a perfect average of one pound per car per mile. It probably clumps up. It clumps up where the steelhead smolts live. It goes in the water. You can look for it. It's not hard. In 2013, the sturgeon population crashed.

We haven't harvested sturgeon in three years. It's not come back. In June of last year, we lost the sockeye run. Over 90 percent of the Columbia sockeye run did not make it. In September, we found that half the coho did not come back. Worse in Puget Sound.

Ocean acidification is a problem. Coal burning is a major cause of that. Don't subsidize our trade deficit. Support our fishing economy.

Submission Number: ***MBTL-SEPA-DEIS-0002173***

Received: 6/7/2016 6:55:53 PM
Commenter: Ruben Oliver
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing about the Millennium coal export project. I believe this project is good for the community. Current world markets and decision in East Asia re capital allocation over the last decade demonstrate that American coal exports are not necessary to, nor causally-related to, decisions in China, Korea or Japan to build coal-fueled power generation capacity. The environmental impacts will occur regardless of Cowlitz County and Ecology decisions to grant permits for construction of the project-specific docks and terminals in question. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0000436***

Received: 5/17/2016 6:57:38 PM
Commenter: Alan Olsen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life.

Submission Number: ***MBTL-SEPA-DEIS-0000993***

Received: 5/24/2016 5:54:41 PM
Commenter: Byron Olsen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. Current world markets and decision in East Asia re capital allocation over the last decade demonstrate that American coal exports are not necessary to, nor causally-related to, decisions in China, Korea or Japan to build coal-fueled power generation capacity. The environmental impacts will occur regardless of Cowlitz County and Ecology decisions to grant permits for construction of the project-specific docks and terminals in question. The agencies are doing a great job of evaluating Millennium Bulk Terminals port proposal. I am convinced that this project’s permit should move forward without further delay.

Submission Number: ***MBTL-SEPA-DEIS-0002812***

Received: 6/13/2016 2:34:15 PM
Commenter: Eric Olsen
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. It is time to put America First for jobs and economy. Please stand up for America and it's citizens. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Olsen, Kevin (0941)

Submission Number: ***MBTL-SEPA-DEIS-0000941***

Received: 5/24/2016 5:21:34 PM
Commenter: Kevin Olsen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied â€" get on with it already. I urge you not to be swayed by outside fanatics who do not care about our county or our people. The environmental review process for Millennium Bulk Terminals should be held to the same standard as every other port or infrastructure project. We have a very fair and comprehensive process in place, and I question the motives of those who say otherwise. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0000049***

Received: 5/3/2016 12:57:06 PM
Commenter: Ben Olson
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing to state my objection to the proposed terminal construction in Longview, Wash. I live in Sandpoint, Idaho, which is on the BNSF line. The railroad tracks travel over Lake Pend Oreille, our lake here in Sandpoint. We already have to contend with heavy rail traffic from coal and oil trains, and the proposed terminal would mean an addition of up to 16 coal trains per day. These coal trains lose lots of coal dust from each car, which ends up depositing in our lake. Not only that, but the risk of derailment into our lake is a very real worry for residents here. We realize that if our lake was the site of an environmental disaster such as this, our town would go into a deep depression for several decades. We rely heavily on tourism, which relies on the lake. Long story short, we get no benefit from the additional coal trains passing through our area. We just get the dirty coal train traffic. Please reconsider the construction of this terminal. We are a vital, thoughtful community here in Sandpoint. We care about what goes into our water and air, and the thought of more coal train traffic in the near future is horrible. Thank you for listening,

Submission Number: ***MBTL-SEPA-DEIS-0001898***

Received: 6/3/2016 3:20:27 PM
Commenter: Kenny Olson
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I live near the railroad tracks in Sandpoint Idaho. I am against shipping coal through Montana, Idaho, Washington or Oregon. The danger to people and the envirment will be huge for many years to come. Please do not allow it to happen!

Olson, Kimi (0570)

Submission Number: ***MBTL-SEPA-DEIS-0000570***

Received: 5/19/2016 6:13:45 PM
Commenter: Kimi Olson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am proud to add my voice in support of the Millennium Bulk Terminals project in Longview. The project is an excellent opportunity for the community and I am thrilled to see that Millennium has made strong commitments both to the economy and to the environment. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it's the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. Thanks again to the agencies for allowing public comment on this important proposal. It should continue to go forward with much enthusiasm.

Submission Number: ***MBTL-SEPA-DEIS-0002771***

Received: 6/13/2016 2:16:01 PM
Commenter: Trent Olson
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***TRANS-LV-Q2-00007***

Received: 5/24/2016 12:00:00 AM
Commenter: William Olson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Well, my name is William Olson. I'm 66 years old. I'm a lifelong resident of Longview, Washington except for the time I spent in the Vietnam war away from home. I worked in a very large industrial complex adjacent to the land where Millennium would like to put a coal transfer station. I spent 33 years there and worked in wastewater, water filtration, and other positions during that period of time. I worked in a lot of pollution and I am against the coal transfer station. I think Longview needs jobs that aren't pollution minded. That in the long run where this coal ends up it will assist in polluting mother earth. And I think that there's enough of that already and that we need to take a longer look at what we do to that end. To prevent additional pollution I think that we have a great opportunity for new types of job in our community. And as a matter of fact, a company just came in. It's a trailer manufacturing company, and there's going to be upwards of 500 jobs. And it's a great opportunity for Longview. It is a low environmental impact type of a company. And the jobs will be good paying jobs, and they will have insurance. And these trailers are 3,000 pounds lighter than the normal trailers that are on the road today being pulled by tractor trailer semis. And that means that they will use less fuel to pull that trailer down the road. And that means less pollution. And that's a good thing. And I've been here, like I said, all my life. And I'm also a member of Ducks Unlimited. I cannot speak for the Ducks Unlimited organization, but on a private note I would say that we have thousands of ducks and geese that winter and live directly below down river on the Columbia of this proposed coal transfer station. Ducks and geese are muddlers. They feed off the surfaces. I believe that there will be coal dust and particulates as small as five and ten thousand microns in size that will escape the location and that will end up on the water and in the air and I believe that a child or children in our community will be affected by the dust that does happen to take place. Working in the industry for 33 years I saw many things that occurred that are unpreventable. Shutdowns, things break, and things happen. Pollution takes place. And we can't prevent everything. And I would rather have Longview seek and secure jobs and companies that provide jobs that are in a better or less polluted environmental category. Thanks for the opportunity to speak, and I appreciate it.

Submission Number: ***MBTL-SEPA-DEIS-0000826***

Received: 5/24/2016 11:34:50 AM
Commenter: Jan O'Mara
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Millennium’s proposed coal export terminal would cause unmitigable harm to the Columbia River Gorge National Scenic Area and communities throughout the Northwest, with the most intense impacts felt in Longview, Washington near the proposed terminal site. The project harms our health and safety, air and water quality, and natural resources. Your agencies must protect public health and the environment by rejecting this coal export terminal. Please do not take action on this proposal. We must protect individual health and our environment and take steps to stifle climate change. Thank you Jan

Submission Number: ***MBTL-SEPA-DEIS-0002805***

Received: 6/13/2016 2:31:19 PM
Commenter: Lauralee O'Neil
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001044***

Received: 5/24/2016 6:31:04 PM
Commenter: James Opfer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The proposed coal export terminal at Longview should be approved. Millennium Bulk Terminals has a clear and environmentally-sound plan that will be studied to make this port a reality and it will do much to contribute to the economy and vitality of the region and the country. Cowlitz County continues to have a high unemployment rate. We need these jobs and we've paid a high cost with this drawn out permitting process so far. It's time to stop the delay and bring about development and economic relief. The opening of Millennium Bulk Terminals proposed coal export facility will have a significantly positive impact not only on the state of Washington but the entire country. So I not only urge you to keep this permitting process moving forward at an efficient pace, but to also to accept the DEIS as sufficient. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001058***

Received: 5/24/2016 6:44:48 PM
Commenter: Richard Opsal
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the opportunity to add my voice to that of others in supporting the environmental study for the proposed port at Longview. The DEIS will present a clear picture of how Millennium Bulk Terminals will proceed in opening and operating this port and the economic, environmental, and social benefits of this project are deserving of approval. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. I urge you not to be swayed by outside fanatics who do not care about our county or our people. The environmental review process for Millennium Bulk Terminals should be held to the same standard as every other port or infrastructure project. We have a very fair and comprehensive process in place, and I question the motives of those who say otherwise. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0002615***

Received: 6/13/2016 11:35:11 AM
Commenter: Elizabeth Opstedahl
Organization: Powder River Energy Corp.
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It is absolutely imperative that we do everything we can to improve the sustainability of US Coal production. It is imperative that we do everything we can to sustain the industry for the economy of our local powder river basin region. Having this terminal in place would make a big difference. I fully support the construction of the Millenium terminal.

Submission Number: ***MBTL-SEPA-DEIS-0001097***

Received: 5/24/2016 7:19:57 PM
Commenter: Andrew Ori
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you.

Submission Number: ***TRANS-SPOKANE-Q3-00005***

Received: 5/26/2016 12:00:00 AM
Commenter: Diane Ornsby
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm Diane Ornsby, O-R-N-S-B-Y. And I just came down to get more information today. And I have to say, when I was listening to testimony, I was leaning towards that this was a good thing until I went in and saw Millennium's actual information. I don't understand why we would build an actual coal terminal. I thought it was going to more of a port situation where we might have other types of things going, like our agriculture, you know, export, things like that. But it's just coal. And I'm not sure why we're going to to to that kind of expense, considering the coal industry, I think, is really on its way out. Which is a good thing, in my opinion.

But, yeah, I'm not sure. I thought when I would go in to look at their information that I would be put at ease, and I was very much the opposite way.

One of the little pieces of information was it would put -- it would be like pitting 672,000 more cars on our roads in one day. Well we're trying to get cars off our roads. So I don't see where this makes sense. And I would oppose actually building the terminal. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001674***

Received: 5/31/2016 6:36:27 PM
Commenter: Jerry Orr
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. Thank you for taking my comment and for providing the opportunity to weigh in. I believe strongly in this project and hope that you will consider the strong commitment Millennium has made to restoring and protecting the environment in our community

Submission Number: ***MBTL-SEPA-DEIS-0000247***

Received: 5/10/2016 5:52:30 PM
Commenter: Daniel Osborn
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to reach out on this important issue. GHG from the use of coal and nationwide rail capacity should not have been included in this study, but now that they've been included and thoroughly studied it's time to move this proposal forward! Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done!

People in Pasco should be believers in the danger of moving coal by trains. On July 3, 2012 31 cars of a coal train derailed spilling coal in Mesa, WA, which Google tells us is only 26 miles north of Pasco. In addition to cutting towns and cities in two for many hours a day, these coal trains will leave a black trail of coal dust all the way to Longview.

Another consideration: After the coal gets to Longview it will be put into open piles and then will be loaded onto ocean going ships and sent off to Asia. I went up the Columbia in an 18 foot pleasure boat from Chinook, near the river's mouth, through Bonneville dam to Cascade locks. I saw that the trip up and down the ship channel is a tricky business and River Pilots earn their big salaries. An accident would be a catastrophe. The lower Columbia is home to both sport and commercial fisheries that don't need more ship traffic or the possiblility of polluted waters. The ships must cross the bar, held by many to be the most dangerous to cross in the world. They call the area The Graveyard of the Pacific.

Finally, this question should be asked: Are Ambre Energy (now Lighthouse Resources, Inc) and Arch Coal (which filed for bankruptcy in January 2016) sufficiently solvent to pay, for example, for a major cleanup operation?

Norm Osterman
1032 Pomona
Walla Walla, WA 99362

Submission Number: ***TRANS-PASCO-M1-00076***

Received: 6/2/2016 12:00:00 AM
Commenter: Norm Osterman
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. My name is Norm Osterman (phonetic). I'm from Walla Walla. People in Pasco should be believers in the danger of moving coal by trains. July 3rd, 2012, 31 cars of coal train derailed spilling coal in Mesa, Washington, which Google tells us it's 20 miles north of Pasco.

In addition to cutting towns and cities in two for many hours of many days, these coal trains will leave a black trail of coal dust all the way to Longview. Now most people stop at Longview, but another consideration is that after the coal gets to Longview it will be put in open piles and then loaded onto ocean-going ships and sent to Asia.

I went up the Columbia in an 18-foot pleasure boat from Chinook near the mouth of the river through Bonneville Dam to Cascade Locks. I saw the trip on The Dalles trip panel is a very tricky business and river pilots earn huge salaries.

An accident in the Columbia would be catastrophic. The Lower Columbia is home to sport and commercial fishery that don't need any more ship traffic or pollution. These ships must cross a bar held by many to be the most dangerous crossing in the world. That is why the area is called the graveyard of the Pacific.

And finally the question should be asked are Amber Energy, and Lighthouse Resources, Inc., and Arch coal which filed bankruptcy in 2015, sufficiently solvent to pay, for example, for a major cleanup operation?

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001670***

Received: 5/31/2016 6:32:42 PM
Commenter: Dale Ostrom
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My comments pertain to the draft EIS for the Longview coal export facility. I hope you will give them good consideration. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed Millennium Bulk Terminal would provide. The project would create work right away during construction, and plenty more jobs would stay around to run the terminal. Plus, all of those wages generated would trickle back into our local and state economies. At a time when our state unemployment rates are below the national average, we cannot miss big opportunities for new business like this one. Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays.

Submission Number: ***MBTL-SEPA-DEIS-0001511***

Received: 5/31/2016 2:31:46 PM
Commenter: Teresa Otto
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium’s proposal is unprecedented and has far reaching economic implications. I applaud the agencies work on this permit process. The results will provide a more-than thorough "hard look" at the possible impacts of the Millennium Project in Longview which is needed to keep things moving ahead. Thank you. Sincerely, Teresa Otto terri_otto@yahoo.com 82732

Submission Number: ***MBTL-SEPA-DEIS-0002098***

Received: 6/7/2016 4:59:43 PM
Commenter: Heidi Owens
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I do not think the DEIS has adequately studied the full environmental impact of the coal dust from the 8 additional trains/day that will come to this terminal and then leave on ships. The technical report on Coal Dust seems to highlight just one study and is more focused on Cowlitz county. There is a lot of ground to cover from Wyoming to Cowlitz county, and if each coal car can loose upto 3% of it's load in dust along the way - what is the real impact on the environment, wildlife, and human health. There should be detailed study that compares cars with the surfactants to those without and also how the coal dust reacts and changes in manners that can effect human health. Just because there are not US standards for this does not mean we should not be concerned. Millions of people live along the transportation route, and they need to know that their health is not jeopardy by this project through INDEPENDENT study that the applicant should pay for. I can tell you that I live close to the Vancouver WA train tracks and I see the results of the coal trains going by on my front porch. After one week at the current level - my railing has little bits of coal and general dust. And as is pointed out in the Coal Dust technical report, even the NEW ZEALAND report does not address the impact on human health. We know for a fact that coal dust is harmful to human health - so what we can take risks with people's overall health so that companies can make a profit off of leased federal land and send the material to Asia. The other aspect that IS NOT studied in this DEIS is that once the material arrives in ASIA and burned in countries like China, that air pollution does not stay in CHINA, no it travels across the pacific and comes back to the NW. If you are going to study the Environmental impact of this project you need to look from cradle to grave - ground to final use and impact beyond that use. Where is the study that shows the impact of coal burning in Asia on the Pacific NW? This study has barely touched the surface of the real impact of this project. I strongly suggest that the environmental impact be looked at more systemically before the Final EIS is completed. Thank you!

Submission Number: ***MBTL-SEPA-DEIS-0000768***

Received: 5/23/2016 2:10:27 PM
Commenter: Martin Owens
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I write today in support of Millennium Bulk Terminals coal export terminal. This is a project that is easy to support because it will benefit families both within and outside of its southwest Washington location. The project presents a path to employment for manyâ€"let's makes it happen. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. Thanks for considering my comments.

Submission Number: ***MBTL-SEPA-DEIS-0001634***

Received: 5/31/2016 6:06:01 PM
Commenter: Al Owler
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. I support Millennium Bulk Terminals site in Cowlitz County. These trains are no different than the coal cars we've transported through our state for many decades. In reality, not one ton more of coal will be used globally because of U.S. exports, and the net gain in greenhouse gas emissions is insignificant. If we don't build these terminals, energy suppliers will just look elsewhere for their supply! Our region is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal will help our recovery. Thank you for beginning the scoping process.

Submission Number: ***TRANS-SPOKANE-M2-00003***

Received: 5/26/2016 12:00:00 AM
Commenter: Ozzie
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening. My name is Ozzie (inaudible), Spokane County. I'm here to talk about public safety because that tends to get brought up in reference to those type of issues.

The public safety entities in Spokane County have taken a hard look at the rail traffic. In Spokane County we have talked with the railroads, we have taken a look at the possible traffic that will come through, and we see no significant danger due to rail traffic, especially this side of the rail traffic because coal is a rock. If it derails, falls on the ground, you can pick it up with a shovel and put it back.

The aspect that I think is important for you to realize is in 2006, Spokane County had its highest rail traffic. That's ten years ago. That rail traffic has never come back to that level since 2006.

Even when the coal trains come through Spokane, it will not match the 2006 levels. So this is not a significant risk because we already have our high points in reference to that.

The other aspect is it comes down to jobs. It really is very much jobs. Jobs in Washington, jobs in Wyoming, jobs in Montana.

I grew up in a coal family. My great-grandfather, my grandmother, my dad, my cousins were coal miners. I went to college because of coal mining. They're good jobs. America needs to protect its economic infrastructures and we need to build further infrastructures.

Those infrastructures that we will build in this port will not only aid Wyoming but it will aid Washington, in that Washington will be able to transport the rest of its products. Thank you very much.

RECEIVED
MAY 27 2016

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- [x] Noise
- [x] Air Quality
- [x] Human Health
- [ ] Rail Transportation
- [ ] Vessel Transportation
- [ ] Vehicle Transportation
- [x] Coal Dust
- [x] Greenhouse Gas
- [x] Climate Change
- [x] Plants and Animals
- [x] Marine Species, Fish, or Fisheries
- [x] Wetlands or Streams
- [x] Water Quality
- [ ] EIS Regulatory Process
- [x] Other topic Does This project Benefit the common Good or just the profits of a retrograde industry?

PLEASE SHARE YOUR COMMENTS BELOW:

After reading the report card on Millennium proposal, the impact which could be grievous and their pitiful plans at mitigation, this would get an "F", if it were presented in a 10th grade science class. The plan is ridiculously short and long sighted, does not take in the dire emergency our planet and all its inhabitants are experiencing. Why are we dwelling on this retro-industry when the future demands us Bold forward looking solutions.

(comment continued) Thank you for taking my comments.

(additional space is provided on the back)

Submission Number: ***MBTL-SEPA-DEIS-0002192***

Received: 6/7/2016 7:11:03 PM
Commenter: Richard Packard
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The proposed coal export terminal at Longview should be approved. Millennium Bulk Terminals has a clear and environmentally-sound plan that will be studied to make this port a reality and it will do much to contribute to the economy and vitality of the region and the country. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. I applaud the agencies work on this permit process. The results will provide a more-than thorough "hard look" at the possible impacts of the Millennium Project in Longview which is needed to keep things moving ahead. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000273***

Received: 5/10/2016 6:35:27 PM
Commenter: Scott Page
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Longview is a town built on natural resources and import/export. I believe this project is a perfect fit for our community. MBT has received a thorough and comprehensive draft EIS review one five years in the making. If we don't take the next step forward and turn this vision into a reality, it's going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Paglieri, James (3487)

June 8, 2016

RECEIVED
JUN 10 2016

Millennium Bulk Terminals EIS
c/o ICF International
710 Second Ave., Suite 550
Seattle, WA 98104

Subject: Comments on Draft EIS for the proposed Millennium coal terminal in Longview, Washington.

We are opposed to the project because of the adverse and unacceptable environmental impacts*. For example, the statement is made in Section 5.2.8 "Unavoidable and Significant Adverse Environmental Impacts" on page 5.2-10 that "Therefore the Proposed Action could result in a significant adverse impact on rail safety in Cowlitz County and Washington State."

A major deficiency of the draft EIS is that the study area needs to be expanded to cover beyond the very limited "project area" to address the entire train route along the Columbia River. The impacts (on water, aquatic life, wildlife, etc.) needs to be addressed for the entire Columbia River route for both normal operations and accidents (e.g. derailments resulting in fire or train cars going into the River).

The potential adverse impacts of noise pollution needs to be expanded (e.g. Bighorn sheep herd, waterfowl, campgrounds, etc.).

The question of whether a train derailment can adversely affect automobile traffic where a road and the railroad tracks are relatively close together, needs to be addressed both from the accident itself and from recovery efforts.

Thank you for the opportunity to comment on the Draft EIS.

Yours truly,

James N. Paglieri & Sheryl D. Paglieri

Mr. & Mrs. James & Sheryl Paglieri
1734 Horn Ave.
Richland, WA 99354-2314

*Many which have previously been stated by others.

Submission Number: ***TRANS-LV-M1-00014***

Received: 5/24/2016 12:00:00 AM
Commenter: Mary Painter
Organization: Saltwater Unitarian Universal Church
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

SPEAKER 14: My name is Mary Painter. I'm here as part of a climate action team from Saltwater Unitarian Universal Church. I'm from (inaudible), Washington in King County.

I'm a grandmother, and I'm focusing my remarks on the potential impact of this project on climate change and global warming.

At the Paris Climate Talks, the nations of the world agreed to take actions that are designed to limit global warming to well below 2 degrees centigrade. We promised our children and grandchildren we would take all determined action to wean ourselves off of fossil fuels so that they can have a chance to live a future in a world with coral glaciers and intact coastal cities.

We know that most of the known reserves of fossil fuels have to stay in the ground. Although difficult and rocky, the path forward to a clean energy future has been starting to come into focus.

Unfortunately, upon closer inspection, that path turns out to be a rail line coated with coal dust at the end of which is a massive coal export terminal and across the seas a cluster of coal-fired electrical plants.

So what are we to make of the DEIS for (inaudible) and coal. From a climate change perspective, if the terminal and the coal-fired electrical plants it will supply and use for many decades the result will be a significant net increase in carbon emissions as the DEIS acknowledges. This is at a time we have promised to reduce our emissions.

With the world watching, U.S. and other industrialized nations must take the lead in living up to the pledges made in Paris. The default on our promise due to projects like Millennium could have far reaching and unforeseen effects and could even lead to an unraveling of the Paris accords. Thank you for the opportunity.

Hello, I'm Joe Pakootas. I'm a Candidate for Congress in Washington's 5th Congressional District. Today, however, I am here as a concerned citizen of Washington. In 2006 I initiated a landmark lawsuit against Teck Cominco, a Canadian mining corporation to force them to clean up their pollution of Lake Roosevelt and the Columbia River.

As an environmental protectionist I have numerous environmental and health concerns regarding the proposed Millennium Coal Terminal in Longview; but as a businessman and CEO of a multi-million dollar corporation who manages over a dozen business enterprises, I also have economic concerns.

In Saturday's Spokesman guest opinion, local officials theorized that hundreds of millions of dollars in "jobs and revenues" could be gained from the approval of this project. This optimistic opinion is unfortunately based upon the assumption that coal will remain a profitable investment.

The truth is investing in coal right now is a very risky and unwise business decision. In March of 2016, the New York Times reported that bankers are recognizing the risk and shifting away from coal investments. Coal companies around the world are feeling the shift to cleaner energy sources. In fact, of the two companies that are proposing this investment, one has declared bankruptcy and the other was sold to their largest creditor - leaving the original investors with nothing.

The proponents of this project are short-sighted and ignore the obvious: coal is a dead man walking. You cannot ignore the simple economic fact that over the last few years coal demand has plummeted around the world. Coal imports to China were down 35% in December 2015. In contrast, investments for renewable technologies in China hit an all-time high that same year. As foreign market coal consumption falls and the global market declines, Washington State will be left to clean up the mess.

If our city and state were to approve of this project, we would be hitching ourselves to a dead horse. This is a bad business decision and Washington state can do better by investing in cleaner, more economically wise sources of energy that have bright futures, not the dirty King Coal.

Submission Number: ***TRANS-SPOKANE-M2-00015***

Received: 5/26/2016 12:00:00 AM
Commenter: Andrea Reineki
Organization: Joe Pakootas, Confederate Tribes of the Caulfield Nation
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. My name is Andrea Reineki, and I'm reading this on behalf of Joe Pakootas.

Hello, my name is Joe Pakootas, I'm the former chair and CEO of the Confederate Tribes of the Caulfield Nation. I'm here to let Congress in Washington's Fifth Congressional District today, however, I'm here as a concerned citizen of Washington.

In 2006 I initiated a landmark lawsuit against Teck Cominco, a Canadian mining corporation, to force them to clean up the pollution along Lake Roosevelt and the Columbia River.

As an environmental protectionist, I have numerous environmental and health concerns regarding the proposed Millennium Bulk Terminal in Longview. But as a businessman and CEO of a multi-million dollar corporation who manages over a dozen business enterprises, I also have economic concerns.

In spite of my spokesman and guest opinion, local officials theorize that hundreds of millions of dollars in jobs and revenues could be gained from the approval of this project. This optimistic opinion is unfortunately based upon the assumption that coal will remain a profitable investment.

The truth is, investing in coal right now is a very risky and unwise business decision. In March of 2016, the New York Times reported that neighbors are recognizing the risk and shifting away from coal investments.

Coal companies around the world are feeling the shift to cleaner energy sources. In fact, of the two companies that are proposing this investment, one has declared bankruptcy and the other was sold to their largest competitor, leaving the other investors with nothing.

The proponents of this project are short sighted and ignore the obvious. Coal is a dead man walking. You cannot ignore the simple economic fact that over the last year the coal demand has plummeted around the world.

If our city and state were to improve this project we would be hitching ourselves to a dead horse. This is a bad business decision and Washington state can do better by investing in cleaner, more economically wise sources of energy that have bright futures, not with dirty king coal. Thank you.

Palmer, Patrick (0778)

Submission Number: ***MBTL-SEPA-DEIS-0000778***

Received: 5/23/2016 2:20:49 PM
Commenter: Patrick Palmer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to submit my comments regarding Millennium Bulk Terminals proposed port at Longview. I fully support this project. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it's time to move forward. Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays.

Submission Number: ***MBTL-SEPA-DEIS-0003292***

Received: 6/13/2016 8:01:00 PM
Commenter: Randy Palmer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing about the Millennium coal export project. I believe this project is good for the community. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium's proposal. Now that the rail corridor has been studied, now it's time for progress on the Millennium project! The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you. Sincerely, Randy Palmer pgcglassco@gmail.com 98626

Submission Number: ***MBTL-SEPA-DEIS-0002854***

Received: 6/13/2016 2:48:41 PM
Commenter: Jake Para
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you

Submission Number: ***MBTL-SEPA-DEIS-0003829***

Received: 6/14/2016 1:20:33 AM
Commenter: Jim Parker
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments
Submission Text
Jim:

My name is Jim Parker. I live in Missoula Montana. As a Montanan along the rail corridor between the Powder River Basin mines and the proposed terminal I oppose the Millennium Bulk Terminals because of the associated increase in coal train traffic through my community. The increased coal train traffic will bring with it increased air pollution and health risks from increased coal dust and diesel exhaust and increased noise pollution.

In addition, the increase in coal traffic through my community will reduce access across the tracks and cause traffic delays for citizens, commuters, for emergency response vehicles when there's a medical emergency or fire, or a need for police. The additional train traffic will also provide greater potential for vehicle collisions with trains and for pedestrian accidents.

As a Missoulian and Montanan, I'm asking that the EIS fully analyze and consider the impacts of this port and the increased coal train traffic would cause here in Missoula and across Montana especially as it relates to the above sited impacts. The proposed project’s impacts are real and significant to Montanans and are connected in cumulative result of what happens if this project is approved.

The EIS prepared by the court in the Washington Department of Ecology in Cowlitz County must include all the connected and cumulative impacts in Montana that will result if the MBTL facilities are approved and constructed. These include the significant connected and cumulative impacts on the project all the way back through Montana to the Power River Basin Coal Mines in Montana and Wyoming.

The increased rail traffic in Montana must be addressed, analyzed, and its consequences fully considered in the EIS. More trains in Montana will mean an increase in the amount of airborne pollutants, from diesel engines as well as from coal dust. Medical studies have shown a clear link between both diesel air pollutants and coal dust and disease.

While those with chronic disease, the elderly, young children, and pregnant women are most at risk, the health effects from particulate matter exposure may occur years later. Even healthy individuals need to be concerned. These issues must be addressed, analyzed, and their consequences fully considered in the EIS. The MBTL facility will directly lead to an increase in the burning of coal. The link between increased coal burning and associated public health problems cannot be ignored and should be included, analyzed, and the consequences fully considered in the EIS.

Finally, because the sole purpose of the MBTL facility is to facilitate the shipping of coal being transported from the PRB to its final destination in Asia, where it will be burned for energy, I also believe that the EIS must fully consider the long term and direct effects that this action will have on the global climate.

In conclusion, I strongly oppose the proposed Millennium Bulk Terminals Longview facility. The connected and cumulative impacts to Missoula, and all of Montana, from the proposed facility, are real and significant. The EIS prepared by the co-lead ggencies for this project must address, analyze, and consider all the connected and cumulative impacts this proposal will have on Montana. Please reject this proposal and take no action.

Thank you.

Steve Running: Yes, I want to particularly point out what I see happening in the global coal markets and global carbon cycle science. That's the stage that I work in, global carbon cycles. We, probably a decade ago, first identified really clearly that the biggest single carbon emission by humanity is burning coal for electric power. It became clear to us right at that point that everything else we do in trying to reduce carbon emissions wasn't going to matter at all if we didn't, first and highest priority, quit burning coal for electric power.

That was over a decade ago. It didn't seem like we were making much progress until about the last year. I can finally say that we've had a pretty good year in global policies. Obviously we all know about the Paris Climate Agreement where every nation signed on to a commitment for driving down carbon emissions, and for most countries that first biggest carbon emission is burning coal for electric power.

What's more immediately relevant to us here is that China not only signed the Paris Agreement, but China actually does a 5-year strategic plan for the nation. What a concept to actually plan the future of your nation. We've got learn something here. In the last 5-year plan, China has publicly announced that they will quit importing coal. What we're clearly seeing is that in 2014 and 2015, China's coal imports went down by actual statistics, so they're making good on this strategic plan that they've announced.

They are starting to drive down their purchasing of imported coal. Of course, their 2 biggest sources are Australia and us. They have already announced that they have a strategic objective to quit buying coal. I can't imagine a worse time for America to be building more coal infrastructure when the biggest customer has already announced publicly that they're going to quit buying. This is really almost a no-brainer.

What I also see now in this last year is that the world financial community has really started to catch on that long-term fossil fuel investment, and particularly long-term coal infrastructure investment, is just plain a bad idea. It's a bad investment. You have very high probability of losing your investment with the trajectory of the global economy and energy. When the world bank and Goldman Sachs, I read almost every week another major financial institution announcing that they are getting out of coal investment ... What we see here is the local version of that same decision point.

You would think this ought to be an easy decision, that the last thing the Pacific Northwest would want to do is invest in long-term infrastructure for coal export when a major customer has already announced that they're going to be capping their imports. I think this is to me, at the global scale that I work at and study and follow, this really should be a pretty easy decision then. This is certainly not a terminal that we want locally, but that even makes any sense in terms of a larger financial picture. It just doesn't make sense one bit. I think that's what I want to leave with you on this topic. Thank you.

Paul Smith: I'm really happy to get a chance to comment on the health implications of the increasing coal shipments by rail for our communities and others. It's easy to make the case that negative health impacts with coal will occur because they've been occurring for the last several hundred years. There's no reason to think a little bit more is better.

I hope to stress the health threats local to Missoula and also stress that this new threat will be greatest on the vulnerable, including children, infants, the unborn, and the elderly. I also have a list of references that I always feel nervous talking and making statements without. If anybody wants the list of the references that at least give the health implications, please see me. Because I take care of children and infants with lung disease, obviously my main concern at the local level is the increase in air pollution from these diesel fumes, coal dust, and worsening climate change.

Data is substantial showing that coal trains do increase bloom concentrations. Diesel emissions are recognized as carcinogens, which was previously noted, and contain toxic substances such as polyaromatic hydrocarbons and particulate matter or PM. Coal dust also adds to air pollution in the form of particulate matter. Of the 6 criteria of air pollutants that the EPA is mandated to regulate, particulate matter is perhaps one of the easiest to track and to correlate with health effects.

It's generated a vast amount of medical literature. We know there is PM increase as public health worsens. We also know that when we lower particulate matter, population health improves. That's an important concept and lends significant credibility to particulate matter being culpable, and justifies action that lowers air pollution. Particulate matter leads to lung damage and diseases such as asthma and COPD. Children are at the highest risk because their lungs are developing and they have more life years of exposure.

This often worsens over decades from accumulating scar tissue along the airways by repeated injury. We have no cure for asthma. For today's living asthmatic children, they may end up being tomorrow's asthmatic cripples. In health, particulate matter also leads to diseases distant from the lungs such as heart disease, stroke, and cancer and even adverse effects on pregnancies and fetal tissue. Infants born to a mother exposed to high concentrations of particulate matter are born smaller, and with impaired lung function.

These more systemic effects outside of the lung happen in part because fine particulate matter can also cross pulmonary system directly into the circulation and they release whatever poisons they contain. Missoula already struggles with air quality in a large part because of our valley inversions that attract pollutants. Despite strong efforts to decrease particulate matter, we often, here in Missoula, are close to the prescribed threshold by the EPA for particulate matter.

There is no safe lower threshold. The more time one spends in high exposure of particulate matter, the greater the effects. Again, this is of special concern to children. Another health concern with coal dust is increased chance of train derailments. You might recall an article in the Missoulian last year quoting the Department of Transportation estimating that there would be over 10 derailments per year in the US of trains carrying nothing but ethanol and oil cargo alone. Missoula is a very populated area. It's time we realize that with only 2 hospitals in our town, we would struggle to handle the type of derailment disaster that hit Quebec killing 47 and devastating a small

town.

Then finally the effects of coal combustion on climate change are already significant here in Montana. As it was noted, we've already come through 2 of the warmest years on records and the warmest April on record. Our snow pack is already lower than normal this year and it's disappearing. Our farmers and ranchers are threatened. Increased forest fires and hot weather will again threaten our health and our children's health.

By way of closing, one of my favorite quotes when giving a talk like this is from CF Elliot in 1909. He was then secretary of Anaconda Copper Mining Company. He stated, "We have the perfect right to carry on a legitimate business and if incidentally we should pollute the atmosphere nobody has the right to complain until specific damage gives them a cause of action." This statement really describes the position that we're in as a company.

We can't stop a process legally until we can show harm. By then, the ground, the air, and the water are contaminated, and our children are sick and it's too late. So ask yourself when we're coming through these discussions what angles are we heading in? Is the public being shouldered with the responsibility to prove harm or is the impetus on the industry to prove there's no harm? Harm to health has already been shown. There is specific cause for us to halt more pollution.

John: Good evening. I'm John Woodland. I retired in January as the Superior, Montana Fire Chief. I'm speaking from my background in emergency services, I do speak for myself. Superior is one of the many small towns along the rail line that this project will negatively impact. Emergency services and access to many of my district's neighborhoods require crossing the tracks. That's true of many other towns along the rail line. This is what's hauling our water supply across the tracks.

I personally waited at a grate crossing for a train to pass while on an emergency service response. This proposal lacked the train traffic. It increased the likelihood emergency services will be negatively impacted in communities all along the tracks. The tracks in Mineral County in places are built right along steep mountainsides next to the Clark Fork of the Columbia River. Trains fall off these tracks sometimes into the river and not that infrequently.

In my 10 years as the fire chief there have been 2 trains in the river in Mineral County. One visible from my home, included empty oil cars, and the other dumped Boeing fuselages into the Albertan Gorge. More traffic means more wrecks. More traffic will also mean more pressure not to hold up the trains for maintenance work which means yet again more wrecks. For Montana, Eastern Washington and Idaho, it also means less access and higher prices to ship agricultural products. For emergency services, today the 800-pound gorilla in the room is climate change.

If you don't think that's emergency service issue just look at the newspaper for the last week, at the evacuation of between 80 and 90,000 people from Ft. McMurray in May in

Northern Alberta, months before there's supposed to be a fire season in that part of the country. This is the future for the entire inter-mountain west if we don't act decisively now with climate change. We cannot continue to invest in fossil fuel projects, such as Longview, and have any chance of limiting the worst impacts of climate change. I urge you to say to no to the Longview Coal Port and yes to acting decisively on climate change now before it's too late.

Michael: My name is Michael Daniel Bolt. I'm a student at the University of Montana. I'm running for House District 98, Montana State District. I think preventing any new coal mining is the best choice. I'm also interested in bringing ideas of increasing government control over the natural resource industry including the coal industry. I believe government run operations of the coal industry would allow us to shut down that industry more responsibly and make any future natural resources extraction use projects really more beneficial to the Montana people. That's the main concession. That's all. Thank you.

Carolyn: Hello, my name is Carolyn Walker. I used to be Carolyn Alderson. I lived along the Tongue River for 20 years of my life. I raised my 3 children there. There is an interesting story about a law and a regulation that actually stopped something. When I lived down there, the Northern Plains Resource Council, I was part of it, was just beginning. That's when you all heard of the Tongue River Railroad. The Tongue River Railroad was thought of and started because there was a mining plan for that area, right on the Tongue River. It was called the Montco Mine.

Well there's a nice picture of me shaking hands with President Carter in 1977 at the signing of the strip mining bill. In that bill there's a piece of the legislation that says, "There shall be no strip mining on Alluvial Valley Floors." The Montco Mine was right on the Tongue River. It caused some difficulty in the community. I just wanted you to know that there are ways to use legislation and rules to stop bad things from happening. My recommendation is that we recommend no action on the Longview Port.

Jim: My name is Jim Parker. I live in Missoula Montana. As a Montanan along the rail corridor between the Powder River Basin mines and the proposed terminal I oppose the Millennium Bulk Terminals because of the associated increase in coal train traffic through my community. The increased coal train traffic will bring with it increased air pollution and health risks from increased coal dust and diesel exhaust and increased noise pollution.

In addition, the increase in coal traffic through my community will reduce access across the tracks and cause traffic delays for citizens, commuters, for emergency response vehicles when there's a medical emergency or fire, or a need for police. The additional train traffic will also provide greater potential for vehicle collisions with trains and for pedestrian accidents.

As a Missoulian and Montanan, I'm asking that the EIS fully analyze and consider the impacts of this port and the increased coal train traffic would cause here in Missoula and across Montana especially as it relates to the above sited impacts. The proposed project’s impacts are real and significant to Montanans and are connected in cumulative

result of what happens if this project is approved.

The EIS prepared by the court in the Washington Department of Ecology in Cowlitz County must include all the connected and cumulative impacts in Montana that will result if the MBTL facilities are approved and constructed. These include the significant connected and cumulative impacts on the project all the way back through Montana to the Power River Basin Coal Mines in Montana and Wyoming.

The increased rail traffic in Montana must be addressed, analyzed, and its consequences fully considered in the EIS. More trains in Montana will mean an increase in the amount of airborne pollutants, from diesel engines as well as from coal dust. Medical studies have shown a clear link between both diesel air pollutants and coal dust and disease.

While those with chronic disease, the elderly, young children, and pregnant women are most at risk, the health effects from particulate matter exposure may occur years later. Even healthy individuals need to be concerned. These issues must be addressed, analyzed, and their consequences fully considered in the EIS. The MBTL facility will directly lead to an increase in the burning of coal. The link between increased coal burning and associated public health problems cannot be ignored and should be included, analyzed, and the consequences fully considered in the EIS.

Finally, because the sole purpose of the MBTL facility is to facilitate the shipping of coal being transported from the PRB to its final destination in Asia, where it will be burned for energy, I also believe that the EIS must fully consider the long term and direct effects that this action will have on the global climate.

In conclusion, I strongly oppose the proposed Millennium Bulk Terminals Longview facility. The connected and cumulative impacts to Missoula, and all of Montana, from the proposed facility, are real and significant. The EIS prepared by the co-lead ggencies for this project must address, analyze, and consider all the connected and cumulative impacts this proposal will have on Montana. Please reject this proposal and take no action.

Thank you.

Harold: I'm Harold Hoem from Missoula. The whole town of Butte Montana went through a long period of horrible air quality early in this century because of ore smelting. Read a book called Smoke Wars. People sickened and then died especially underground miners like my grandfather who was cut down in the prime of life by lung disease. The corporate giants called the air pollution a nuisance. It was deadly. Oh, what a nuisance Biff was to my family.

What are some corporations proposing to do this century later but ship Montana coal overseas so citizens there can get sick and die from nuisance called coal? A friend of mine who was a former coal mine manager says this, "The problem with the coal mining industry is the product is a poison”. We know that CO2 is increasing dramatically. It is now over 400 parts per million. Humanity hasn't seen this stuff but it is affecting climate

change dramatically.

The current wildfire in Ft. McMurray in Alberta Canada caused the evacuation of over 88,000 people. The smoke from each building is hundreds of miles away. Perhaps a wake-up call for Montana. We have rapidly declining snow pack and are facing longer and harder, tired, and more dangerous fire seasons and possibly worse than Iroquois. For sure a nuisance for residents and a real downer for tourism. The DEIS gives Montana a scant potential.

They say 16 additional coal trains a day would go through Missoula that cite inflated numbers for existing traffic of 25 to 28 trains. We currently see only 13 to 15 trains. 16 more trains would double current traffic. The effects would ripple down all the impacts of safety risks, derailments, noise, dust, the laser crossings et cetera. They should know where our current capacity is and give assurances that deficiencies will be mitigated. My last word , bring down CO2 emissions by switching to renewables. Vote no action. Show the US means business in climate litigation.

Gary: I'd first like to thank Northern Plains and the Hoems in particular for it, and Les Anderson coming all the way from Longview to speak here. The speakers, it's been a very nice haven. Thanks for this opportunity to comment. Hi there, I'm Gary Mattson. I live in West Riverside, which is a suburb of Milltown. I really seriously, if the most serious effects of this port certainly have to do with health and climate change.

For those reasons, I am just baffled that so many people either ignore the science, or deny the science, or simply don't know about the science. I cannot understand why we have so many people that are not supportive of recognizing climate change demand. Some of the effects aren't realized. I can see in my community. Milltown has one singal entrance to it across on the south side of Powder River, there is one railroad crossing.

If that railroad crossing was blocked, no emergency services can occur. Our fire chief manager will recognize that concern. In Missoula County that's 10. That has a significant impact. The additional of 16 trains would really be a big impact on emergency services. For multiple reasons, I would strongly recommend that no action alternative.

George: Thank you, thank you all for being here. My name is George Price. I was asked to represent an organization I belong to named Indian People's Action. Indian People's Action asked me to be here as an environmental issues coordinator.

I would like to put our input collectively in here; just the fact the basis what coal is doing to our climate and the life on earth. I think that should be enough reason to keep it in the ground, not transport it anywhere. Anybody who's paying attention and looking at how fast this is escalating climate change to an unpredictable level at levels with all the other elements that are being released. Rising sea levels, you can go down the whole list if anybody's honest about that, you would say yes, let's stop all of this.

I'd also like to say let's look at the paradigm shift and deeply question a society that creates incentives for people to write environmental impact statements that are

intentionally lying to the people for profit, for money in a society that lives for money. I'm not going to go into my whole historian's diatribe there. I had often wondered what if the people who came from across the ocean, and likeminded people that welcomed innovation in Massachusetts had come to learn instead of to control. It's great. Can we start on the right foot now? I recommend the no action on behalf of Indian People's Action of Montana.

Dave: Hi, my name is Dave Dittloff. I'm the regional representative for National Wildlife Federation. Most of you are probably aware of National Wildlife Group. We're the folks who put on Ranger Rick Magazine. That's our biggest identifier here with the kids.

In 3, 4 years that that's going to take, yet there's nothing coming back up the streams in order to spawn salmon. The impacts are almost certainly down to relating to some of the impacts here. Last year, last summer's conditions literally had most of the species dying, most of the adults coming back to the rivers and streams here to the headwaters of the Columbia River Basin died due to high temperatures, directly related to climate change.

I want to talk a little about, quickly here's something that hasn't been hit hard today, talk about wildlife. It starts right from the beginning. You look at the mine site here, the direct habitat displacement, the coal recommendation that follows it, that impacts wildlife. If you look at what happens on the mine sites with water, that impacts fish and wildlife. The next connector we look at has it transferred over? We look at the trains. There's been a lot of talk about human health and consequences here which are really important. Those same impacts are related to wildlife for particularly the fisheries here. That coal dust gets in the streams. There's mercury concern with it here and other neurological issues are a concern.

Mercury is bad for people eating the fish as well. We've got dozens of streams and multiple dozens of lakes in Montana that had mercury consumption warnings here. You can only eat so much of the fish. That's an impact to wildlife. You look at the ports, same thing here. The direct construction of the ports, this place is habitat for sure. That has real consequences to the fisheries. You'll see salmon come in and out of the ocean as well here.

Lastly, climate change, I got to talk to you about salmon. Name a critter, even the biggest critters, white tail deer, elk, etc. that think generalist that those are for generalist. There's impacts here. More and more research that's done it's really impact of Montana's out pour heritage, it's culture, what we like to do here whether it's sightseeing, hunting, fishing, what have you here. Fishing is a multi-billion dollar industry in Montana and the Pacific Northwest. There's economic reasons associated with wildlife as well here. I appreciate it. No action alternative makes sense for wildlife.

Dave Jones: Hello, my name is David Jones. I've been a fly fishing guide in Montana for over 30 years. Dave just inspired me to get up here and talk about what I see in my career fishery that I work primarily in. My season has been shortened by an average of about 6 weeks in the 30 years I've been doing this. We don't have clients in August anymore at all because of

the low flows. Half the time our rivers are shut down because we have to worry about railing over there. Anybody that watches the forester around in the spruce moss and the beetle kill, it's just obvious that Montana is being really affected. We mentioned the economic impact, but really we're talking genocidal, ecocidal impacts for climate change. We ought to think in those terms really. This is an emergency. I recommend no action on the terminal. Thank you.

Steve: Hi, my name is Steve Schwartz. I live here in Missoula. I'm a professor interior of the Department of Communication Studies at the University of Montana. I teach and do research in environmental communication. No matter what the coal industry says about the free market, their goal is to get government on their side to make the market work for them whether it's supporting carbon cash receipt frustration, whether it's blocking the clean power plan, or supporting coal export infrastructure like MBT as a goal. It's past time for us to use our voice to remind government agencies who's side they need to be on and who's interest they need to represent.

The connected and key note we've heard about tonight on public health and safety, on air, land, and water, on wildlife, and on climate change are common in house. They're shared by the residents of the Pacific Northwest, shared in common by the people who live in Washington and Idaho and here in Montana. We all deserve a voice in this decision. For that reason, I want to thank all the organizations that have made this opportunity possible for so many of us to express our voices. To protect the commentators in the Department of Ecology, to take no action, thank you.

Jim: My name is Jim Roach. I've been a Missoula resident for 45 years. I don't understand why it's draft Environmental Impact Statement doesn't address impacts for rail traffic in Montana. That seems sort of ridiculous. It seems like a rip off. On behalf of my family, and my friends, and a lot of people that I know are neighbors, I just want to say we don't want any more coal dust. We don't want any more diesel fumes. We don't want any more threat of derailment. We don't want traffic complications from increased rail traffic. We don't want the noise.

Most of all we don't want the climate impact. We don't want the endless smoky summers. We don't want the low stream flows and the sick fish. We don't want the reduced fishing opportunities. We don't want increased beetle kill. We don't want disappearing biodiversity. We don't want damage to agriculture. We don't want the drought. We don't want climate refugees. We don't want shut downs of skiing areas. We don't want this action, no action. Thank you.

Claudia: My name is Claudia Narcisco. I am speaking for myself today. When I was trying to find some things that I was going to speak about, I found an old letter that I had written in I guess November 2013. There goes my letter. I had it on my phone and mailed it to myself. Anyway, it was hard enough to read. I emphasized that connection actions between the mine and the port and Asia and the impacts on climate change and how it would cycle back to us.

I requested that they consider this. I cited a section of the National Environmental Policy

Act. I believe it was section F2 or 2F that specifically directed agencies to consider international ramifications of actions which is not something that we normally associate with, but it's just that it was our responsibility to do that. Obviously those things were not necessarily done, as far as I could tell, to this point.

I hope that's considered.

Submission Number: ***MBTL-SEPA-DEIS-0000910***

Received: 5/24/2016 5:08:16 PM
Commenter: Marlene Parker
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it's time to move forward. When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001662***

Received: 5/31/2016 6:26:33 PM
Commenter: Patrick Parker
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I write today in support of Millennium Bulk Terminals coal export terminal. This is a project that is easy to support because it will benefit families both within and outside of its southwest Washington location. The project presents a path to employment for many, let's makes it happen. Please commit to a timetable for the issuance of a final EIS. Ecology’s SEPA Rules require a final EIS to be issued as close as possible

Submission Number: ***MBTL-SEPA-DEIS-0000403***

Received: 5/17/2016 6:21:55 PM
Commenter: Ralph Parker
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to reach out on this important issue. In regards to coal dust & human health impacts: Please refer to the American Lung Association's report on state / county rankings. First please note that the incidence of pediatric and adult asthma for Cowlitz Co is 9.1%, Clark Co. is 9.0%, and Yakima Co is 8.9%. Then compare this same statistic to communities where coal is produced or shipped through such as Campbell Co WY at 9.0%, Box Butte Co, NE (Alliance) 6.96%, Lincoln Co NE (North Platte) 6.98%, or St. Louis Co MO 7.68%. Further, the ALA ranking for 24 hr particulate matter in Campbell Co WY scores a grade of B, as compared to Clark Co WA at F and Yakima Co WA at F. The evidence is obvious, coal production and transportation is not causing a health problem, but it can act as a remedy to an economic downturn. Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on Millennium's application.

Submission Number: ***MBTL-SEPA-DEIS-0000259***

Received: 5/10/2016 6:14:25 PM
Commenter: Sharon Parker
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I've been following this issue, and am glad to have the chance to weigh in. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. Now's the time to utilize trade infrastructure. The Millennium Bulk Terminals project is one step closer to being able to participate in this vital business. Thanks to the agencies for considering my comments.

Submission Number: ***TRANS-LV-M2-00104***

Received: 5/24/2016 12:00:00 AM
Commenter: Carey Parks
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi, my name is Carey Parks (phonetic). I'm a third generation Washingtonian and I'm here because this project doesn't just impact those of you who live in Kelso/Longview, it impacts everybody in the state and the people who live in the areas that the trains will be passing through on their way here, so I feel I have the right to speak here on behalf of me and the health of my community.

Some of you think you are going to get a great job from this project, but you are investing in a dying industry that has a reduction in demand. Wouldn't you rather have a job that will last for a long time in sustainable industries that will make our communities thrive instead? That's where the economy is going. And those who pay attention to the future are the ones who are going to do better than the ones who ignore it.

As a consumer, I'm an example of this emerging green economy. I started spending my money on goods and services that weren't available 20 years ago. All this money creates green jobs in our community. I drive a hybrid vehicle that comes in through the Port of Vancouver. It uses half as much gas as my previous car.

I buy groceries from a natural food store. I put solar panels on my home. This year I moved my retirement savings into sustainable business. You know what? My investment manager was pretty skeptical at first. But after he saw those investments made more money than the typical ones, he was sold.

Placing a coal terminal will damage the local economy which depends on agriculture and tourism. Washington state is one the biggest agricultural states. Those goods and services are being crowded out by the increase of trains that are bringing oil and coal through here.

Did you know that Washington state employs 155,000 people, creates 5 billion in pay, and generates 1.1 billion in taxes from economic -- or tourism. Who's going to come here for a dirty city?

Submission Number: ***MBTL-SEPA-DEIS-0000313***

Received: 5/11/2016 1:27:21 AM
Commenter: DALLAS PARR
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and wan to underscore my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing market, thereby spurring greater investments at home. Washington has long depended on trade and exports as vital part of our economy, directly and indirectly creating nearly 40 percent of all of our stat's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0001584***

Received: 5/31/2016 5:26:04 PM
Commenter: Paul Partridge
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. Thank you for accepting comments for this important proposal. The Millennium project will do a great deal for the economic outlook of this country. Let's get Americans back to work!

Submission Number: ***MBTL-SEPA-DEIS-0001329***

Received: 5/26/2016 7:03:37 PM
Commenter: Deborah Paterakis
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to comment on the draft EIS for this extremely important project. I have been waiting for this opportunity for a very long time, and having now reviewed the draft EIS, I can see why it has taken so long. You have taken an unnecessarily broad scope and studied each aspect of it to death. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you.

Submission Number: ***TRANS-PASCO-M2-00031***

Received: 6/2/2016 12:00:00 AM
Commenter: Patricia
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. My name is Patricia. I have lived in Montana. I was born in Montana by Glacier National Park. I have lived in Wyoming. I have seven children who were born in Wyoming and we moved to the state of Washington in 1990. All seven of these children went to states where higher education was subsidized by coal and/or energy industry.

It's very helpful to the economy of any state to be able to put to use these funds that could be used through the Millennium Bulk Terminal. All of them have jobs outside of the state of Washington but would like to return to Washington when Washington becomes an industry-friendly state.

93 million Americans have quit seeking work. Washington needs these jobs, and we need to remember that coal is actually -- it is the perfectly packaged energy product which has been preserved for us for quite a few years beneath the Earth and, when we use it in a judicious manner for our human consumption, it can benefit all of us.

The best way to help that man standing by the highway with his hand out for help is a job. I don't believe in handouts, I believe in handups, and I think that this project could definitely benefit at least people in Spokane, and people along the way.

The covering of those coal trains is not going to allow dust along the way. Wyoming, Montana, Idaho are all beautiful states and have had coal industries in them and I've lived there.

I'm one-sixteenth Native American myself, and I also -- I also have a great respect for the environment and I urge the acceptance of the Millennium Bulk Terminal.

Patrick, Sean (3610)

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☒ Air Quality
- ☒ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☒ Coal Dust
- ☐ Greenhouse Gas
- ☐ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

I HAVE READ THAT THE LONGVIEW COAL TERMINAL WILL INCREASE COAL TRAIN TRAFFIC BY ~~^~~ approx. 8 TRAINS PER DAY. ~~THIS~~ THE ADDITIONAL AIR QUALITY BURDEN PLACED ~~INTO~~ into THE AIR ALL ALONG THE RAIL ROUTE, DUE TO COAL DUST AND DIESEL FUEL FUMES IS NOT AN ACCEPTABLE TRADE OFF FOR THE ADDITION OF A HANDFUL OF (MOSTLY TEMPORARY) JOBS. ARSENIC + MERCURY CONTAMIN IS SERIOUS TO MY KNOWLEDGE, AND MY HOME IS NEAR THE BNSF TRACKS – MY HEALTH + THE HEALTH OF MY NIECE AND NEPHEW SHOULD N

(additional space is provided on the back)

(comment continued)

BE PLACED AT RISK FOR SUCH A SMALL COMMUNITY PAYOFF. I FIND THE IDEA OF CAMPAIGNING FOR THE ~~PAYOFF~~ "JOBS", of building / running THE EXPORT TERMINAL, AT THE RISK OF MY HEALTH AND THE HEALTH OF MY FAMILY, TO BE UNCONSCIENABLE AND TRULY SELFISH.

I URGE YOU TO DENY THE BUILDING OF THIS FACILITY IN THE INTEREST OF ~~SAME PEOPLE~~ PROTECTING THE HUMAN HEALTH OF THOSE OF US UNFORTUNATE ENOUGH TO LIVE NEAR BNSF TRACKS.

THANK YOU.

SEAN PATRICK

Submission Number: ***MBTL-SEPA-DEIS-0003123***

Received: 6/13/2016 5:49:25 PM
Commenter: Andrew Patterson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium’s proposal is unprecedented and has far reaching economic implications. I applaud the agencies work on this permit process. The results will provide a more-than thorough "hard look" at the possible impacts of the Millennium Project in Longview which is needed to keep things moving ahead. Thank you. Sincerely, Andrew Patterson 12powerhouse@gmail.com 98626

Submission Number: ***MBTL-SEPA-DEIS-0001125***

Received: 5/24/2016 7:45:11 PM
Commenter: frank patterson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. Regulators have been looking at this project for years, and it’s time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments it’s time to let it. It is important that the public have the ability to comment on projects of this nature as the affects will last for years to come. Thank you for the opportunity to comment and please see that this project is worthy and should be allowed progress forward and develop.

Submission Number: ***TRANS-LV-Q2-00001***

Received: 5/24/2016 12:00:00 AM
Commenter: Frank Patterson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Frank Patterson. I've worked for Millennium since they first came into Longview, Washington. I have seen -- let me rephrase. I have worked for different contractors. Millennium is a great company, very sincere to their employees and the community. I believe we couldn't do any better here in Cowlitz County than to have them here. And that's about it.

Submission Number: ***MBTL-SEPA-DEIS-0001116***

Received: 5/24/2016 7:39:36 PM
Commenter: Patricia Patterson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it’s time Longview went back to work. The draft EIS to evaluate Millennium Bulk Terminals proposed Longview project should be kept within reason. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with the process in a timely manner. It's the fair thing to do.

Submission Number: ***MBTL-SEPA-DEIS-0001217***

Received: 5/26/2016 5:59:23 PM
Commenter: Robert Patterson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview’s quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0002097***

Received: 6/7/2016 4:59:05 PM
Commenter: Teresa Patterson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0000373***

Received: 5/15/2016 11:10:39 PM
Commenter: Christina Patti
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am OPPOSED to the construction and operation of this marine terminal for coal export, primarily on the basis of the environmental contamination which would be incurred. Coal mining, processing, transport, and usage pollute the local and global environment at every stage of the process and harms local communities, wildlife, and aquifers in every area in which the respective parts of this industry operate. These effects are unnecessary, as alternate sources of energy exist, and long-lasting far beyond the temporary usefulness of the fossil fuel itself. Secondly, the coal industry in general is in downturn and in the process of being phased out of use entirely. Constructing this terminal would be be a huge fiscal expenditure which would wind up being a parasite to the Longview port. As demand dwindles, any jobs created by such a terminal would be gone within a few generations (at best) and would create a localized employment depression. The municipal port would be left with a disused eyesore and pollutant parasite of a facility which will only make productive business and community use of the terminal in future additionally onerous in having to demolish and build over the remnant of this short-term financial folly. As a citizen of the state of Washington I URGE the Washington State Department of Ecology and my neighbors in Cowlitz County to REJECT MBTL's proposal and protect Washington from the pernicious and deleterious coal industry.

Submission Number: ***MBTL-SEPA-DEIS-0001206***

Received: 5/26/2016 1:13:07 PM
Commenter: Dan & JoAnn Patton
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
No coal trains through the columbia river gorge a national scenic area..

Submission Number: ***TRANS-LV-M2-00005***

Received: 5/24/2016 12:00:00 AM
Commenter: Kathleen Patton
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Kathleen Patton, and I'm a minister here in Longview, Washington. I want to talk about conspiracy. You may know that the words conspiracy, inspiration, and respiration all share the same root, which means breath or spirit.

To respire is to continue to breathe. To conspire is to breathe with, to be inspired is to be infused with spirit. I say the planet breathes. The planet has spirit. And you and I conspire with the planet breathing together with all creation.

We animals inhale oxygen and exhale CO2 and the green creatures inhale CO2 and breathe out oxygen. And all of this is balanced in a delicate dance by the spirit that allows us to all live. You can call it a great conspiracy of life. The earth spent billions of years organizing this conspiracy, millions sequestering enough carbon from the atmosphere to make it work for complex animals like you and I to survive and to breathe.

But we humans have stopped conspiring with the earth in some measure and now we conspire to undo millions of years of life's generating conspiracy in just a few generations as we mine and transport and burn coal.

This DEIS estimates that the carbon pollution generated from operations in Cowlitz County alone would approximate that as 8,000 additional cars on the road. And I believe it is conservative in estimating burning this coal will result in an additional 672,000 car comparable.

Let's break with this conspiracy, with coal investors, and conspire with our brothers and sisters throughout the world which grows hotter every day. Conspire with those whose homes are threatened by rising sea levels. I urge no action.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000025***

Received: 4/30/2016 10:24:52 PM
Commenter: Michael Paul
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the agencies offering this opportunity to comment on Millennium Bulk Terminals DEIS. The port at Longview will bring many good paying jobs to Washington and will encourage the development of our natural resources nationwide, helping to lift us out of our current nationwide economic depression. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don't hold them up any longer. Sincerely, Michael paul

Submission Number: ***MBTL-SEPA-DEIS-0000577***

Received: 5/19/2016 6:21:02 PM
Commenter: Randall Paul
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm glad to have the chance to make a comment about this project as it's very important to me. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn't have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0002059***

Received: 6/7/2016 4:25:09 PM
Commenter: Paula
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Allow me to submit my comments regarding Millennium Bulk Terminals proposed port at Longview. I fully support this project. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and should be treated as such. An environmental review of this time and scope should not have been needed to redevelop an old smelter site. The Draft EIS is sufficient, it’s time to move forward. The opening of Millennium Bulk Terminals proposed coal export facility will have a significantly positive impact not only on the state of Washington but the entire country. So I not only urge you to keep this permitting process moving forward at an efficient pace, but to also to accept the DEIS as sufficient. Thank you.

Submission Number: ***TRANS-SPOKANE-M1-00030***

Received: 5/26/2016 12:00:00 AM
Commenter: Pauline
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Pauline. I live here in Spokane so close to the rail line that I can see the trains crossing a high bridge going over Latah Creek. Thank you for providing this opportunity for us to publicly express our viewpoints in regards to the proposed Millennium Bulk Terminals near Long Beach (sic).

I am opposed to the building of this coal terminal for a number of reasons. Probably the biggest overarching reason is because our world is warming at an alarming rate, and I concur with the 97 other scientists who say this warming is due to human activity.

Right now, in our own geographic area, we had record breaking wildfires last summer due to the extremely dry climate -- not climate but situation, and we are aware of the fire that started recently in western Canada and it's still burning.

Glaciers are melting back at an unusually fast pace in Glacier National Park and in Alaska.

It makes no sense to me that we build a structure, the largest coal export facility in North America, to send coal to China so we can continue to burn these fossil fuels and end up with more carbon dioxide into the atmosphere and ultimately speeding up global warming. I'm trying to understand how it is that people continue on a course that is so detrimental to our environment.

I understand the need for jobs, but clean, renewable forms of energy production such as solar and wind also provide jobs and could provide more if they were subsidized at the same rate that coal has been subsidized by the federal government for many years.

I prefer to put my money and energy into constructive activities that are shown to be beneficial to the most people over the long run. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001080***

Received: 5/24/2016 7:00:23 PM
Commenter: John Pavka
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment. JOBS.....Jobs.....jobs Gentlemen, Let's get this right AMERICAN JOBS

Submission Number: ***MBTL-SEPA-DEIS-0001798***

Received: 6/2/2016 5:14:02 PM
Commenter: Peter Pavloff
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our economy and our families are suffering. We can do something about this by supporting the proposed port at Longview that will put people to work quickly and will keep them gainfully employed for years to come. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed Millennium Bulk Terminal would provide. The project would create work right away during construction, and plenty more jobs would stay around to run the terminal. Plus, all of those wages generated would trickle back into our local and state economies. At a time when our state unemployment rates are below the national average, we cannot miss big opportunities for new business like this one. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

RECEIVED
MAY 27 2016

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- [x] Noise
- [x] Air Quality
- [x] Human Health
- [x] Rail Transportation
- [ ] Vessel Transportation
- [ ] Vehicle Transportation
- [x] Coal Dust
- [ ] Greenhouse Gas
- [ ] Climate Change
- [ ] Plants and Animals
- [x] Marine Species, Fish, or Fisheries
- [x] Wetlands or Streams
- [x] Water Quality
- [ ] EIS Regulatory Process
- [ ] Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

my feelings on Coal coming through Longview, WA to me would sound good, as the Big deal makers are saying. Sure it would provide more jobs but at what cost. Month health visits to the doctor's office or the emergency room for, but not limited to Black lungs, Blockage of arteries, Shutdown of the nervous system, human intelligence is Reduce greatly.

(comment continued)

(additional space is provided on the back)

not to mention the air becomes hazardous and toxic. people being to have heart failures. These are just a few of many issues longview, WA just can not afford. We already deal with big factories that Denie but it is very obious that they also are pullution the air quality. The animals can become fossiled because of the chemicals from the coal dust. Not only are those affected but those that dig in coal mines suffer the most. I myself am highly allergic to sulfur and would just progress the degline in my own health. I am against bring coal in or through longview. Especially because the people are not asked first but as asked after the facts of train carts loaded with coal and I watch hundreds if not more preces fall off the trains with out proper coverings.

to prevent loss of a coal and the Being a long battle of the health and well being on Cowlitz county citizens and the surrounding areas that the trains go through. I truly feel that this is another mistake.

Sincerely,

Ms. Pavon

Submission Number: ***MBTL-SEPA-DEIS-0001122***

Received: 5/24/2016 7:43:01 PM
Commenter: Ryan Pawlowski
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I’ve been following this issue, and am glad to have the chance to weigh in. GHG from the use of coal and nationwide rail capacity should not have been included in this study, but now that they’ve been included and thoroughly studied â €" it’s time to move this proposal forward! I applaud the agencies work on this permit process. The results will provide a more-than thorough "hard look" at the possible impacts of the Millennium Project in Longview which is needed to keep things moving ahead. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000841***

Received: 5/24/2016 12:34:18 PM
Commenter: John Payne
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Moving this project forward is important to me, my family and my community. MBT has received a thorough and comprehensive draft EIS reviewâ€"one five years in the making. If we don’t take the next step forward and turn this vision into a reality, it’s going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. I sincerely appreciate the opportunity to submit these comments on the Draft EIS. Let's get this project moving forward so there are more good-paying jobs in the U.S.A. Sincerely, John Payne john@rancheswest.com 59047

Submission Number: ***MBTL-SEPA-DEIS-0002539***

Received: 6/11/2016 10:41:51 PM
Commenter: Gary Payton
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

There is a time to collect data and listen to experts and the public. And, there is a time to look deep inside and act based on what is right…right for Washington, right for the Pacific and Inland Northwest, and right for the planet. And, that action is not nursing along an ill-conceived project via a lengthy dEIS and EIS process. The right action is to reject the Millennium Bulk coal export terminal and end the discussion. It is time. You have heard countless citizens offer their concerns: 16 more trains per day through towns in MT, ID, and WA; 44 million tons shipped to Asia to come back to use as mercury laden snow and rainfall; coal dust; reduced property values; traffic delays especially for emergency responders; more and more diesel particulate; and, yes, the acceleration of our ever heating planet due to CO2 contributions to climate change. In December 2015, I was in Paris as an official observer of the UN Climate Change Conference (COP21). So was Governor Inslee. Here is what he said there after signing international agreement to curb climate change: “While national leaders continue to work on broad and necessary measures to curb global emissions, cities, states and regional partners have been building momentum together for climate action. We’re at the forefront of driving innovation in clean technology, electrification of our transportation systems and efficiencies in our homes and offices. Washington state is at the leading edge of this technological revolution.” “This is an opportunity to renew our commitment to fighting carbon pollution and work across borders to find creative solutions to climate action. Washington is not alone when we act on climate, and these partnerships are a way to forge ahead, share best practices and collaborate on policy that works on a local scale to effect global change.” Does this sound like support for the export of the dirtiest of fossil fuels from Longview, WA? Does this sound like support for the last coal export terminal standing after five have gone down in OR and WA in the past few years? You have a job to do, I understand that. Bury the Millennium Bulk Terminals in the final language of the DIS, so we can both use our skills to develop/deploy more renewable energy sources and shift the state, the nation , and the world to a very low-carbon economy by 2100. Gary Payton 1189 Janish Drive Sandpoint, Idaho

Submission Number: ***MBTL-SEPA-DEIS-0000115***

Received: 5/5/2016 10:54:04 PM
Commenter: Mike Peacock
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing today to express my support for the Millennium Bulk Terminals project in Longview. I am glad for the opportunity to voice my support of this important project. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough â€" now it is time to move forward with a fair process for permitting. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium's proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time. Sincerely, Mike Peacock

Submission Number: ***MBTL-SEPA-DEIS-0000428***

Received: 5/17/2016 6:49:23 PM
Commenter: Mike Peacock
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Submission Number: ***MBTL-SEPA-DEIS-0001271***

Received: 5/26/2016 6:31:45 PM
Commenter: Dawn Pearson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for this opportunity to voice my support of Millennium Bulk Terminals - Longview project. This port will benefit the economy of the region, and that of the nation. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Submission Number: ***MBTL-SEPA-DEIS-0001265***

Received: 5/26/2016 6:28:09 PM
Commenter: Terry Pearson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The Millennium Bulk Terminals proposed coal export terminal should be approved and the port should be allowed to move forward. It's good for Washington and her neighbors. Please commit to a timetable for the issuance of a final EIS. Ecology’s SEPA Rules require a final EIS to be issued as close as possible

Submission Number: ***MBTL-SEPA-DEIS-0000338***

Received: 5/11/2016 2:53:24 AM
Commenter: BRAD PECK
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I want to voice my support for the proposed Millennium Bulk export facility in Longview. I want to commend you for such an in-depth environmental review. With this exhaustive review, I am confident that the project will meet Washington's already high environmental standards. However, we must also keep in mind our economy and the livelihoods of our citizens. The Millennium terminal will positively impact Washington for years to come. Additionally, the tax revenues from the project will support projects and services for the state's citizens. The project also offers an opportunity to expand our ports, ensure that jobs are created and [reserved, stimulate growth in the local and regional economy. Thank you for considering my comment.

Submission Number: ***TRANS-PASCO-M1-00041***

Received: 6/2/2016 12:00:00 AM
Commenter: Brad Peck
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. My name is Brad Peck. I'm a county commissioner here in Franklin County, home of the multibillion dollar agricultural economy that relies on intermodes of transportation for a variety of products.

Just by way of credential and background, I have been a proponent in the need for process on behalf of the Department of Defense covering the state of Alaska working with every federal agency, every tribe, local communities. And one of the lessons that I've learned from them that I think is instrumental here is finding a balance. Because it's just not possible to give any one group or interest everything they want.

How do we balance the interest of protecting the environment, which I believe every single person wants to do with also protecting the lives and welfare of the people that live in a region in a multibillion dollar industry, that we have here? We do that by recognizing first and foremost humans on this planet demand electrical power and they will get it in the form of electricity. And a large part of it in Asia will come from burning from coal or petcoke, and petcoke being a far worse product, whether it comes through Washington state or Canada I believe it's going to get there.

I believe we should look for ways to encourage development of integrative (inaudible) to combine cycle power plants that don't have (inaudible) on coal, but recognize we are not going to see additional nuclear in that region any time soon. Wind, solar and hydro are not the answer. So until then it is coal. The question is: Does it come from Canada or Washington? How do we do that and find a balance respecting the environment to the extent that we can without undermining the socioeconomic impacts for all the people that live in the region?

Thank you very much.

Submission Number: ***MBTL-SEPA-DEIS-0002878***

Received: 6/13/2016 2:57:48 PM
Commenter: Greg Peck
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0003094***

Received: 6/13/2016 5:25:56 PM
Commenter: Greg Peck
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002887***

Received: 6/13/2016 3:00:17 PM
Commenter: Trudie Peck
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003097***

Received: 6/13/2016 5:26:48 PM
Commenter: Trudie Peck
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

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- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

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Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☐ Greenhouse Gas
- ☐ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☒ EIS Regulatory Process
- ☒ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

THE COMMUNITY OF LONGVIEW-KELSO AND SURROUNDING COWLITZ COUNTY CITIZENS SHOULD VOTE ON THIS PROJECT, NOT OUTSID PEOPLE (ACTIVISTS & PROTESTERS FROM OUTSIDE OUR COMMUNITY). WE NEED MORE EMPLOYMENT OPPORTUNITIES IN COWLITZ COUNTY AND A FAIR SYSTEM OF APPLICATION & ENVIRONMENTAL COMPLIANCE FOR NATURAL RESOURCES EXPORTERS. WE NEED TO REDUCE THE NATIONAL DEBT AND IMPROVE THE DECLINING BALANCE OF TRADE. SOUTH KOREA IS A TRUSTED ALLY AND

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(comment continued)

(OVER)

THIS EXPORT WILL ASSIST THEM IN MAKING CAR & STEEL PRODUCTS FOR AMERICANS. MANY OUTSIDERS FORCED OUR PUD TO INVEST IN WINDMILLS THAT THEIR COMMUNITIES DO NOT HAVE TO BUY POWER FROM. I TRUST THAT THE STATE & COWLITZ COUNTY WILL MONITOR THIS EXPORT BUSINESS CLOSELY. THIS EXPORT PROJECT IS MUCH EASIER TO CONTROL THAN THE PROTESTERS WHO COME INTO OUR COMMUNITY AND REALLY DON'T CARE ABOUT OUR RIGHT TO WORK OR OUR NATIONAL DEBT.

Alan J Peffley

ALAN F. PEFFLEY
KELSO, WA

Submission Number: ***MBTL-SEPA-DEIS-0001801***

Received: 6/2/2016 5:20:47 PM
Commenter: Peggy
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete â€" it's time for progress. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002045***

Received: 6/6/2016 7:13:09 PM
Commenter: Marvin Pemberton
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As a long time resident of the Pacific Northwest I have a deep and rich appreciation for our beautiful land. I have been in the East Coast and seen some of the blighted coal export sites. The era coal use is limited due to the environmental damage caused by mining, shipping and burning coal, and the clean efficient and growing renewable energy sector. The scars that this export site will leave on our beautiful land, rivers and ocean will long outlast the benefits gained by the coal use.

Submission Number: ***MBTL-SEPA-DEIS-0002905***

Received: 6/13/2016 3:05:30 PM
Commenter: George Penner
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002479***

Received: 6/10/2016 2:20:57 PM
Commenter: Les Penning
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. I support Millennium Bulk Terminals site in Cowlitz County. These trains are no different than the coal cars we've transported through our state for many decades. In reality, not one ton more of coal will be used globally because of U.S. exports, and the net gain in greenhouse gas emissions is insignificant. If we don't build these terminals, energy suppliers will just look elsewhere for their supply! It is important that the public have the ability to comment on projects of this nature as the affects will last for years to come. Thank you for the opportunity to comment and please see that this project is worthy and should be allowed progress forward and develop.

Submission Number: ***MBTL-SEPA-DEIS-0000242***

Received: 5/10/2016 5:41:52 PM
Commenter: Bradley Penny
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State's role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0002670***

Received: 6/13/2016 12:48:47 PM
Commenter: Faith Peppel
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002155***

Received: 6/7/2016 6:41:29 PM
Commenter: Christopher Percifield
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview's quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality.

Submission Number: ***MBTL-SEPA-DEIS-0001291***

Received: 5/26/2016 6:44:22 PM
Commenter: Robert Perez
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). There might not be many who know how much coal is used in everyday occurrences, but for those who do, know Millennium's project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both. Thanks for reading my comments.

Submission Number: ***TRANS-LV-Q2-00026***

Received: 5/24/2016 12:00:00 AM
Commenter: David Perk
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Hello, my name is David Perk. I am from Seattle, Washington. I am a parent. I am concerned for my child's future. I'd like to address what I perceive is a missing element from the Draft EIS. Why isn't the federal government's social cost of carbon being used to evaluate the impact or the greenhouse gas emissions of the proposed Millennium Bulk Terminals? The social cost of carbon has multiple discount rates. The higher the rate, the less value placed on impacts to future generations. Climate instability, sea level rise, and ocean acidification pose a greater threat to future generations than to us. While this places the moral imperative on us to act responsibly, clearly a low discount rate is more appropriate when calculating costs borne by future generations. I ask that the Department of Ecology adopt the social cost of carbon for the project's final environmental impact statement and use a low discount rate to determine the cost of the Millennium Bulk Terminals' greenhouse gas emissions. Using a modest discount rate of three percent with a 2038 adjusted price of $60 per ton of CO2 equivalent, I find the net annual emissions of the Millennium Bulk Terminals in 2038 would cost $193,861,500, and that the 20-year accumulated cost for 2018 through 2038 would be $2,255,449,380. Clearly these costs strongly support the no action alternative.

Submission Number: ***TRANS-PASCO-M1-00025***

Received: 6/2/2016 12:00:00 AM
Commenter: Carol Perkins
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Carol Perkins (phonetic), and I've lived in Pasco most of my life. I've read the articles here and they're impressive. And I've noticed people demonstrating out here that are against this facility. I am not expert enough to make that decision. I'm hoping you people on this board are. I think I speak for the majority of the people who aren't as knowledgeable as we should be about this.

It is true we're all concerned with more jobs so our people can have a living wage, especially single parents. At the same time, I too am concerned with our environment and the fact that our infrastructure, like the rail -- the train, the rails for the railroad aren't up to what they should be in many places, especially when you're adding these things. I don't have at my fingertips the information to make those decisions. I'm hoping you people do. And you will be remembered because I think everybody here will recognize you if we saw you again. So we are depending on you to make informed decisions.

What they say -- what Millennium says they're doing here is good. I hope you will see that they do these things. I'd like to think from the people that have been speaking in their benefit that they truly believe that this company will do it. We need companies that are responsible like that. If they are indeed that responsible, I hope you people will fight for them.

Submission Number: ***MBTL-SEPA-DEIS-0000879***

Received: 5/24/2016 4:44:41 PM
Commenter: Clarence Perkins
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Moving this project forward is important to me, my family and my community. Cowlitz County continues to have a high unemployment rate. We need these jobs and we've paid a high cost with this drawn out permitting process so far. It's time to stop the delay and bring about development and economic relief. I applaud the agencies work on this permit process. The results will provide a more-than thorough "hard look" at the possible impacts of the Millennium Project in Longview which is needed to keep things moving ahead. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002324***

Received: 6/9/2016 5:18:16 PM
Commenter: Nicole Perkins
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. There might not be many who know how much coal is used in everyday occurrences, but for those who do, know Millennium’s project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both. Thanks for reading my comments.

Submission Number: ***MBTL-SEPA-DEIS-0001372***

Received: 5/26/2016 7:24:45 PM
Commenter: Brian Perleberg
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. The draft EIS is thorough and complete in nature. We are unaware of any other EIS ever produced where they have looked at the end-use of the product. This is equal to Washington State not allowing BP to import oil because Saudi Arabia has not done a CO2 analysis of the end user. This is bad policy and stifles job creation. Cowlitz County has an unemployment rate of 8 percent. Millennium Bulk Terminals can bring great jobs to our county, not to mention the much-needed tax revenues. Millennium has spent significant resources to clean up the Reynolds Smelter Site and associated port area. We can have jobs and environmental protection balanced to keep people in Cowlitz County Working.

Submission Number: ***MBTL-SEPA-DEIS-0001980***

Received: 6/6/2016 2:32:38 PM
Commenter: Judith Perry
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

COMMENTS ON MILLENNIUM BULK TERMINAL DEIS – June 6, 2016 1. Millennium is asking for approval to do business in Longview without fully acknowledging the social and health costs to the community and to individuals. Coal dust impacts are not “insignificant” to existing communities where there are coal piles and coal by rail deliveries. It is a huge problem affecting neighbors ‘ homes and property, as well as water quality. The Final EIS should present real world examples of coal dust pollution in terminal communities and how Millennium will guarantee to truly minimize this cost to the community. 2. Many commenters have called attention to the health effects of coal dust as air pollution. Health data from other coal communities should be presented and acknowledged as a cost Millenium is asking the Longview area to accept. 3- What about the economic cost to all those with business and real estate in Longview? The Final EIS must show real estate data from before and after coal bulk terminals were built in communities elsewhere. How will a coal terminal affect future business and opportunities in Longview? Can Millenium show an economic benefit from coal terminals elsewhere other than the number of jobs promised? I fear this coal terminal will be a blight on future hopes Longview might have for growth and development. 4. Increased coal and oil unit trains are already causing serious costs and impacts to Washington’s farmers when the unit trains have priority and loads of agricultural products must wait. How will the great increase in coal unit trains not cause huge losses to these farmers? It is not sufficient for Millennium to say others will build more rail tracks to ease congestion. A remedy for this problem needs to be presented in the Final EIS so that it will be in place at the same time that Millennium proposes to increase the rail traffic. Otherwise, here again is an unacceptable cost to prosperity and health in the project area. The DEIS has left too many unacknowledged costs to the community in Longview, the communities along the rail routes and the agricultural interests of Washington. Yours truly, Judith Perry

Submission Number: ***MBTL-SEPA-DEIS-0002438***

Received: 6/10/2016 1:21:00 AM
Commenter: Mary Peters
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
It is a concern to me that pollution will be connected with the transport of this material through my area.I oppose this project. No coal train =s through Pasco. please.

Submission Number: ***MBTL-SEPA-DEIS-0000775***

Received: 5/23/2016 2:15:05 PM
Commenter: Milt Peters
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. Thank you for your work to move forward with this project.

Submission Number: ***MBTL-SEPA-DEIS-0001947***

Received: 6/6/2016 2:01:15 PM
Commenter: Bonnie Petersen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. Ultimately, global warming and the impact of fossil fuels on the environment are national government and international government issues and did not need to be studied in this DEIS. Now that it's done, let's move on to the final EIS! Enough with the schedule delays, bring this process to a close.

Petersen, Jeffrey (0028)

Submission Number: ***MBTL-SEPA-DEIS-0000028***

Received: 5/1/2016 2:37:54 AM
Commenter: Jeffrey Petersen
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Coal is dying. Coal companies are going into bankruptcy. Vancouver is clean and beautiful, and we don't need to risk an environmental disaster by investing in a dirty coal terminal, especially when coal is going the way of the dinosaurs. Invest in clean energy instead. Put jobs in a growing industry, not a dying one.

Submission Number: ***MBTL-SEPA-DEIS-0002792***

Received: 6/13/2016 2:24:39 PM
Commenter: Michael Petersen
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. Please support this project as it will support many families from Washington to montana . With today's technology this project can easily be done responsibly. This study has taken too long. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001997***

Received: 6/6/2016 2:47:17 PM
Commenter: Brandon Peterson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly support the project and the thousands of jobs this project will create. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let's be clear, the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. This is an old industrial property being redeveloped. Keep the review to what is normal and factual.

Submission Number: ***MBTL-SEPA-DEIS-0001996***

Received: 6/6/2016 2:46:19 PM
Commenter: Kellie Peterson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! Millennium Bulk Terminals in Longview is offering to create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.

Submission Number: ***MBTL-SEPA-DEIS-0001537***

Received: 5/31/2016 4:54:09 PM
Commenter: Paul Peterson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Millennium Bulk Terminals will bring jobs and stability to Cowlitz County. Export projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen. Coal exports are a huge opportunity for the Northwest. The infrastructure coal companies are creating will expand trade of all kinds, from apples to software. At a time of increased competition from both West and East Coast ports, Washington needs to seize these opportunities to expand trade and create thousands of family-wage jobs. Thank you for taking my comment and for providing the opportunity to weigh in. I believe strongly in this project and hope that you will consider the strong commitment Millennium has made to restoring and protecting the environment in our community.

Submission Number: ***MBTL-SEPA-DEIS-0000767***

Received: 5/23/2016 2:09:54 PM
Commenter: Tom Peterson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Moving this project forward is important to me, my family and my community. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium’s proposal is unprecedented and has far reaching economic implications. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0000077***

Received: 5/5/2016 4:36:12 PM
Commenter: William Petes
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

This project is a great opportunity for this community to generate revenue and put people to work. This area once thrived on Industrial jobs and riverfront opportunities that have seen dramatic decrease in last few years. If this EIS addresses concerns about safety, health, environment and whatever else, and they will be mitigated, then move forward!

Submission Number: ***MBTL-SEPA-DEIS-0000396***

Received: 5/17/2016 6:14:53 PM
Commenter: Judy Petitto
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. Too often, projects that promise historic economic opportunity like Millennium Bulk Terminal get lost in cumbersome procedures and bureaucratic delays. This is unacceptable. Our communities need to foster economic growth when it comes knocking on our door. This project has the ability to deliver this, and has earned a fair and detailed draft EIS after five long years

Submission Number: ***MBTL-SEPA-DEIS-0001001***

Received: 5/24/2016 5:59:11 PM
Commenter: John Pettigrew
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

In a time that has included seeing neighbors and friends out of work and under-employed, we need to encourage economic development. In my opinion, that cannot happen soon enough. That is why I am writing today. GHG from the use of coal and nationwide rail capacity should not have been included in this study, but now that they've been included and thoroughly studied, it's time to move this proposal forward! We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage?

Submission Number: ***MBTL-SEPA-DEIS-0002886***

Received: 6/13/2016 3:00:07 PM
Commenter: John Pettigrew
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0000691***

Received: 5/23/2016 12:37:18 PM
Commenter: Betty Petty
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for this opportunity to voice my support of Millennium Bulk Terminals - Longview project. This port will benefit the economy of the region, and that of the nation. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied â€" get on with it already. I applaud the agencies work on this permit process. The results will provide a more-than thorough "hard look" at the possible impacts of the Millennium Project in Longview which is needed to keep things moving ahead. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002559***

Received: 6/12/2016 7:34:12 PM
Commenter: Ben Pfeiffer
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

This environmental impact statement for a coal terminal must be revised in recognition that we have already emitted more than our just share of greenhouse gas emissions, and are therefore morally obligated to remove greenhouse gases from the atmosphere. To emit more through extraction, processing, and transport of coal is madness. It would accelerate the disastrous global warming effects that we have already set in motion through our past emissions. The draft environmental impact statement for the Millennium terminal indicates that up to 44 million metric tons of coal would be shipped to and from the terminal each year. If it is burned efficiently, this would result in carbon dioxide emissions of about 160 million metric tons of carbon dioxide each year. It would also result in disastrous consequences for human health. This coal belongs in the ground, not on our overtaxed rail network, not on rail lines leaving clouds of coal dust in our communities, not in coal power plants abroad. The coal industry is collapsing and coal prices are plummeting, because burning coal cannot feasibly be reconciled with even the loosest environmental standards. To export this cargo is a crime against humanity, especially for future generations. Please revise this draft to demonstrate how, if it is possible, this proposal can be reconciled with prompt reduction of global atmospheric greenhouse gases to 350 ppm CO2e, the level climate scientists say would give us a reasonable chance of avoiding catastrophic global effects. Total CO2 in the first half of the 21st century has to be kept below 750 billion metric tons to give us only a 75 percent chance of avoiding global warming of 2 degrees Celsius or more. How can we reconcile this proposal with that requirement? Are the Millennium partners prepared to bear the costs of mediating the health and global warming consequences of this proposal? How can we allow the imposition of those costs on us and future generations?

Submission Number: ***MBTL-SEPA-DEIS-0000075***

Received: 5/5/2016 10:49:34 AM
Commenter: Nancy Pfeiler
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Hello Fine People: I live in Salem, Oregon and am really opposed to this terminal. Located just three hours north of where we live, along the Columbia River, the proposed terminal would ship a maximum of 44 million metric tons of coal from the Western United States each year to markets overseas, making it, if built, the largest coal export terminal in the country. It would be extremely detrimental to both the local environment and the global climate. They cite issues such as increased train traffic, coal dust, and the eventual burning of the coal — which would result in an increase in greenhouse gas emissions — as reasons why the state should reject the project. That increase in greenhouse gas emissions will be substantial, the draft EIS found. The report estimates that, between 2018 and 2038, the total additional greenhouse gas emissions created by the project would be 37.6 million metric tons of carbon dioxide equivalent — roughly the same as adding8 million passenger vehicles The EIS highlighted a range of other impacts too. Based on its location, the EIS stated that the noise from the rail cars delivering coal to the export terminal would likely have a disproportionately high impact on low-income and minority communities, which are clustered near the proposed terminal spot. The EIS also found that the project could have an adverse impact on the physical or behavioral responses of fishes, potentially impacting tribal resources, though the statement suggests that these impacts would likely be small. Likewise, the project would impact rail transportation by potentially overloading the existing capacity of BNSF railways — as proposed, the project would require an additional 16 trains per day. The statement estimates that, if constructed as proposed, the project would increase the chance of rail collisions by 22 percent throughout Cowlitz County and Washington. The increased rail traffic would also likely impact the average driver, as an increase in train activity would cause road delays at between four to six crossings throughout town, especially during rush hour. The statement also notes that, while the chances are low, increased boat traffic to and from the export terminal would raise the chances of a significant vessel incident, and there are no mitigation measures that could eliminate that chance entirely.

Phalan, Ben (0487)

Submission Number: ***MBTL-SEPA-DEIS-0000487***

Received: 5/18/2016 5:41:43 PM
Commenter: Ben Phalan
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

After viewing the Millennium Bulk Terminals-Longview SEPA Draft Environmental Impact Statement, I would like to express my support for the "No-Action" alternative presented. I do not believe that building new coal export infrastructure is consistent with the commitments that have been made by Washington State, and by the United States, to take meaningful action to address the risk of climate change. The proposed coal export terminal would also have a range of negative local impacts. I note that even if the suggested mitigation measures are fully implemented, "unavoidable and significant adverse environmental impacts could remain for nine environmental resource areas", including on tribal fishing resources and greenhouse gas emissions. I also note that the co-lead agencies received over 217,500 comments on the Proposed Action during the scoping period, expressing concern about the proposal. It is my hope that these concerns will be heard, will be taken seriously, and that the proposal to build a new terminal will be rejected.

Submission Number: ***MBTL-SEPA-DEIS-0003232***

Received: 6/13/2016 7:02:58 PM
Commenter: Amy Phillips
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscores my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. Washington has long depended on trade and exports as avital part of our economy, directly and indirectly creating 40 percent of all our state's jobs. Ushering in developments like Millennium Bulk Terminals - now thoroughly reviewed and vetted - will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0003308***

Received: 6/13/2016 8:16:44 PM
Commenter: Amy Phillips
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003286***

Received: 6/13/2016 7:52:31 PM
Commenter: Brandon Phillips
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003040***

Received: 6/13/2016 4:54:16 PM
Commenter: Diane Phillips
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would love for this to happen. Unfortunately the state of Washington will prohibit our coal from going through their state. They simply don't want coal out of the ground for whatever reason. They like to use the power that comes from it but doesn't realize where that power comes from.

Submission Number: ***MBTL-SEPA-DEIS-0001922***

Received: 6/4/2016 10:53:05 PM
Commenter: Glenda Phillips
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The comments I have are for impacts that will impact me directly as a resident near the mouth of the Columbia River and within 5 minutes walking distance from my home to the Seaside beach which is down current from mouth of the Columbia. I live in a community dependent upon tourism. Our livelihoods would be devastated by our beach polluted by a spill, grounding, vessel fire, vessel accident off our beach. Our tourists travel to Astoria to take in many of the tourist activities associated with the Columbia River estuary (Ft. Stevens, Astoria broardwalks, waterfront businesses, streetcar, museums, etc.) They travel to Warrenton to the dog park along the estuary and shop at Fred Meyer and nearby shops in that shopping center. Adding 1680 vessel trips with the associated impacts ARE NOT tourists attractions! The Social and Community Resources Analysis must include impacts outside of the small area of Longview, WA! The Millenium Bulk Terminal makes it possible for coal to be shipped to Asian markets. Due to its existence, an entire corridor of coal transport becomes a reality impacting thousands of people, in communities all along its route. The environmental study needs to analyze the impacts all along the route. The Health Impact Assessment should be based upon the EIS, not the DEIS, once the public has had an opportunity to identify additional concerns. Dust control using water alone lasts only as long as the water doesn't evaporate. What happens after that? If additional wells are drilled to supply water for dust control in dry weather, how is the aquifer impacted? Do local wells in the area need to be drilled to a deeper depth? How is the runoff water from the dust control treated? The Vessel Transportation Fact Sheet said my feelings well ". . . no mitigation measures that can completely eliminate the possibility of an incident or its impacts." Those that live downstream and upstream from this proposal have nothing to gain, and only the risks to bear. How are our communities mitigated for the costs and risks we assume upon the terminals operation?

Submission Number: ***MBTL-SEPA-DEIS-0001724***

Received: 6/1/2016 9:38:53 AM
Commenter: Lance Phillips
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The coal industry is a vital part to being able to provide for my family. As a subcontractor for the mines, I can say that their 1000's of families like mine that rely on the coal industry for there way of life. Stopping the export of coal out of Wyoming would be catastrophic to Wyoming economy. I know my kids enjoy attending the new school that was just built with minerial money from coal tax. Therfore, trying to shutdown the coal industry doesn't only effect the worker and families of coal mines but 1000's of subcontractors with families just like me.

Submission Number: ***MBTL-SEPA-DEIS-0002565***

Received: 6/12/2016 11:21:55 PM
Commenter: Newton Phillips
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I find the siting impacts in Longview to be consistently within US EPA guidelines, and appear to be (as presented) to be within rules and statute in the State of Washington. I have concerns about the covenants to be established pertaining to environmental enforcement of all standards, which will need to include reducing or suspending operations if a significant environmental or public safety event, either situational or ongoing, cannot be mitigated within the guidelines and timelines agreed upon. Some of these will be decided in negotiations out of the public eye, pertaining to the siting and enforcement of those rules; here will be the larger matter, one upon which the public may not be so privy to. I support what I have seen "so far" as adequate, but as they say, "the Devil is in the details." If the details are right, the project will be an asset to the area. In the holistic view of all the components which will go into this project, the transportation infrastructure may be the most vulnerable aspect going forward. Neither the railroads nor the various government entities have quite addressed all that this project will require in terms of traffic congestion mitigation, rail security and emergency response. Minimum standards may have been met, but I feel they fall short in many communities who will suffer long EMS response times due to the road-level rail intersections. Included in this are the small communities of the Lower Columbia (with nearby populations in Oregon) and Longview in particular, which will be denied access to nearby EMS during long coal trains. Major changes to highways and/or rail are necessary to prevent EMS and existing industrial/commercial commerce interruptions. Millennium will need to be a part of the mitigation, probably via a percentage-ton-tax Trust Fund to be divided among communities impacted according to need, such that entities may float bonds backed by their share of income, thereby immediately construct necessary remediation before the long trains begin hauling. Finally, much has been said of jobs. Commerce and growth always bring compromises on the road to community wealth, and more than any time in history we are able to address most concerns in advance. More than mere jobs, we are talking about the life and health of two communities continents apart: For China, it is a transition fuel, one which they are learning to use more cleanly, also one which keeps them moving, working and feeding their population (more than 18% is estimated to be consumed to heat and cook, as the only source of domestic energy in suburban and rural homes). For America, it means that the leading manufacturer of the components necessary for "Green Energy" can continue to produce for both communities. For Longview, how we handle this will open the door to more manufacturing, Import/Export, and the "Green Energy" jobs of the future. Make no mistake, when the issues are correctly addressed, and we demonstrate the resources of this community, the world will know Longview and the Lower Columbia are open and ready for commerce. That day will be one I have awaited for over twenty years along with thousands who commute 200-800 miles every week in search of work because the work just floats down the river, right past us. Like many of my neighbors I commute daily to the Portland Metro area to work. In the last 13 years I've had NO work here. I ask: If you multiply this by the hundreds on both sides of the river, what is the environmental/economic impact of that? How deep has been the impact of the irrecoverable work losses and resulting poverty on both sides of the river? Name the cost of this....then do something to fix it. I'm not doing it for me. I'm looking towards the futures of our children. Every technology is built upon the shoulders of the first; the changeovers require more than a generation. This is where the path to a brighter future begins, if we do it right.

Submission Number: ***MBTL-SEPA-DEIS-0000757***

Received: 5/23/2016 2:02:45 PM
Commenter: Robert Phillips
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it's time Longview went back to work. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003141***

Received: 6/13/2016 6:01:07 PM
Commenter: Roy Phillips
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000584***

Received: 5/19/2016 6:28:44 PM
Commenter: Jon Pickett
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

In a time that has included seeing neighbors and friends out of work and under-employed, we need to encourage economic development. In my opinion, that cannot happen soon enough. That is why I am writing today. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it's time Longview went back to work. I greatly appreciate you considering my input.

Submission Number: ***MBTL-SEPA-DEIS-0003162***

Received: 6/13/2016 6:12:30 PM
Commenter: Brent Pierce
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter

Submission Number: ***MBTL-SEPA-DEIS-0003159***

Received: 6/13/2016 6:10:47 PM
Commenter: Lynnette Pierce
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter

Submission Number: ***MBTL-SEPA-DEIS-0001865***

Received: 6/2/2016 6:12:44 PM
Commenter: emmanuela pierre
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. Ultimately, global warming and the impact of fossil fuels on the environment are national government and international government issues and did not need to be studied in this DEIS. Now that it's done, let's move on to the final EIS! When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001800***

Received: 6/2/2016 5:16:16 PM
Commenter: Tim Pietrzak
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing today to express my support for the Millennium Bulk Terminals project in Longview. I am glad for the opportunity to voice my support of this important project. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible.

Submission Number: ***MBTL-SEPA-DEIS-0000698***

Received: 5/23/2016 12:44:56 PM
Commenter: Jerry Piger
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium's proposal. Now that the rail corridor has been studied, now it's time for progress on the Millennium project! Thanks again to the agencies for allowing public comment on this important proposal. It should continue to go forward with much enthusiasm.

Submission Number: ***MBTL-SEPA-DEIS-0002076***

Received: 6/7/2016 4:36:57 PM
Commenter: Fredrick Pikula
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water â€" coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! I’ll look forward to updates.

Submission Number: ***MBTL-SEPA-DEIS-0001532***

Received: 5/31/2016 4:51:29 PM
Commenter: Robert Piland
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Longview is a town built on natural resources and import/export. I believe this project is a perfect fit for our community. GHG from the use of coal and nationwide rail capacity should not have been included in this study, but now that they’ve been included and thoroughly studied â€" it’s time to move this proposal forward! This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0000513***

Received: 5/19/2016 5:15:51 PM
Commenter: Glenn Pinterich
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold’s site. They are an important part of our community and economy and will do even more great work once their permits are granted. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0002019***

Received: 6/6/2016 3:03:49 PM
Commenter: Sergey Pisarchuk
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on the DEIS of the proposed Cowlitz County coal export terminal. This is an excellent project and one that will bring broad-ranging economic benefits to Washington and to the national economic outlook for years to come. This project is exactly the kind of economic boost that the state really needs. The benefits are numerous. The terminal would create jobs, generate significant new tax revenue, and help attract businesses to our area. In many ways, it can be a source of continued growth for years to come. It is tough to believe that a project with an obvious upside like this has been held up for so long. Those in charge should view this project for its benefits to the community and see it through to the finish. Our citizens are counting on it. I sincerely appreciate the opportunity to submit these comments on the Draft EIS. Let's get this project moving forward so there are more good-paying jobs in the U.S.A.

Submission Number: ***MBTL-SEPA-DEIS-0000407***

Received: 5/17/2016 6:25:44 PM
Commenter: Alexie Pitsch
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. Cowlitz County has a surplus of industrial sites which impedes the development of the Reynolds Smelter site (due to cost of remediating and redeveloping a brownfield site). Millennium is taking on the redevelopment and can turn around a dilapidated, underutilized site. Grant the project its permits! Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Submission Number: ***MBTL-SEPA-DEIS-0001621***

Received: 5/31/2016 5:58:11 PM
Commenter: Clint Plaisted
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs and the proposed port at Longview will create much needed employment for hundreds of Americans. Please include my comments as part of the public response to Millennium Bulk Terminals plan. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. I’m certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

Submission Number: ***MBTL-SEPA-DEIS-0000350***

Received: 5/11/2016 12:35:00 PM
Commenter: sacha platteeuw
Organization:
State: Outside the United States

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
In short: stop diggin coal out of the ground! Longer version: it would be silly to sell the coal to other nations when it is dug out: you think the CO2 will stay nicely abroad? please stop.

Submission Number: ***TRANS-SPOKANE-Q2-00005***

Received: 5/26/2016 12:00:00 AM
Commenter: Steve Plemons
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Steve Plemons and I'm a resident here in the city. In fact, I live quite close to the railway tracks. Our building is about three blocks away downwind -- down the prevailing wind. And so we see a lot of dust and the dust is black. It's not like the dust when we lived a mile or two upwind, which was more brownish, or grayish, or yellowish. This dust is black.

When you wet a towel and wipe off a glass table on our balcony, the towel turns black. The manager of our building -- it's an eleven-story building, we're up very high, tells us that this is true all over the building, that they clean the patio furniture, they clean railings that we have, the building gets a lot of maintenance. And they have to deal with the soot from the diesel engine of the railroad and also the dust from the coal.

I've gone over to the tracks -- I've probably violated the law, and picked up and photographed lumps of coal that bounce off the tops of the hoppers. They're open. They're not covered. And the chunks of coal are piled up above the side walls of the hoppers. And when they stop, as they often do because of rail traffic, you can just see them with the lumps of coal well above the sides of the hoppers.

And so when the cars are moving along, those lumps are bouncing around and they fall off from time to time. And so that's why you find these lumps of coal along the tracks.

So I've heard people say in the other room giving testimony -- public testimony that, We already have coal, so what's the problem? Well, the problem is undeniable that it is polluting our air and getting into our lungs, and that's even worse than the mess that it creates, of course, on balconies, and railings, and such.

So one of the comments that many people are making is that we need these jobs. We must have these jobs. So who really benefits the most from producing more coal? Who wants that coal? Who's planning to use that coal? It's the industries in China. It's the government of China. It's a state-run company. They want the coal.

Why do they want our coal? Because they would rather have less problems with their citizens being affected by the coal dust and their cities being affected by the coal dust from the mining and the coal activity that they have there now.

So they can get the coal from us and they can reduce the immediate impact on them. Even worse, they burn the coal and then the pollution comes right back across the Pacific with the prevailing winds, which can easily be seen, the coal dust at times has crossed the Pacific on planes -- and seeing the pollution from China coming across the Pacific and reaching our coast and coming inland.

So we get the pollution even perhaps more than they do. But certainly, it comes back to us. If we are the source of the coal, we will get the pollution back here as we already are, to a great extent.

But what about these jobs -- these jobs that we're going to have here that we hear about, most of them, of course, from the construction of the plant, not from the operation of the facility, actually, to export the coal. So why are we so excited about jobs when we are going to give them the coal to burn for electricity so they can smelt steel, and produce steel, and create all kinds of jobs doing that and other heavy industries with the electricity that their coal plants

generate and produce products that t sell back to us? They get the value added; all we get is producing a raw material.

Why is it that so many people in our country are excited about that? Why don't they stop and think that we are basically prostituting ourselves to a Socialist economy in China that they have nothing but contempt for so they can add value to the product and sell back their stuff to us cheap.

So I also hear people talking about God and, you know, that this is our destiny that we need to do this. Well, in the Bible, in the Koran, in the Hindu scriptures, in Buddhist scriptures, and certainly in human history, lots of human folly has been reported. And if we continue to pillage our own land for a few jobs so that the Chinese can have more jobs, that seems like the height of folly.

We need to think very carefully about whether we want to go down this path. And, you know, lots of people are speaking to the earth, and to the watershed, and to climate, and those are all very serious issues. But just specifically talking about coal trains coming through Spokane, and through our beautiful state, and what net effect that will have on our economy, I think we should all be very, very troubled that we're even considering this proposal.

Submission Number: ***MBTL-SEPA-DEIS-0000714***

Received: 5/23/2016 1:04:56 PM
Commenter: Patricia Plowman
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and should be treated as such. An environmental review of this time and scope should not have been needed to redevelop an old smelter site. The Draft EIS is sufficient, it's time to move forward. Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

Submission Number: ***MBTL-SEPA-DEIS-0001625***

Received: 5/31/2016 6:00:26 PM
Commenter: S Plummer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it’s time to move forward. The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality.

Submission Number: ***TRANS-LV-M2-00079***

Received: 5/24/2016 12:00:00 AM
Commenter: Jim Plunket
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. My name is Jim Plunket (phonetic). I'm a retired engineer. Earlier today the speaker who had held some elective office asked you to disregard all the emotion, fear, and hype in the room and just use the facts of the DEIS to do your work. How else could it be? What else do we have using here?

Everyone on both sides has real concerns about the future. And you should see and understand the emotion and fear. Not the hype, just the emotion and fear. If it was just about the facts, you might think we could put the EIS through a Smartphone and get a yes or no answer.

But even some of facts in the DEIS can't be trusted. Bill Chapman, CEO, earlier made a point of telling us that this 44 million tons of coal a year won't add to the world's or the U.S. greenhouse gas emissions. Sure enough, page 12, section two bar chart, no difference. It shows greenhouse gas emissions for no action versus terminal. How do we do this with a straight face?

Actually, what the chart shows is that Millennium thinks the coal market is endless. It will never be saturated. No climate agreements will ever make a difference. The market is huge and endless, not even price makes a difference to Millennium. When the coal runs out, it's over.

Submission Number: ***TRANS-LV-Q1-00071***

Received: 5/24/2016 12:00:00 AM
Commenter: Jim Plunkett
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Jim Plunkett. I'm a retired engineer. Earlier today a speaker who had held an elected office asked you to disregard all of the emotion, fear, and hype in the room and just use the facts of the DEIS to do your work. How else could it be? Everyone on both sides have real concerns about the future. You should see and understand the emotion and fear and not the hype. Of course, if it was just about the facts, you might think we could put the DEIS through a smart phone and get a yes or no answer, but even some of the facts in the DEIS can't be trusted. Bill Chapman, CEO, made a point of telling us this morning that shipping 44 million metric tons a year won't add to the world's or the U.S. greenhouse gas emissions. Sure enough the SEPA doc, section two, page 12, has a bar graph that shows greenhouse gas emissions for the terminal versus no action, no difference. Burn 44 million tons a year and no greenhouse gasses? How can we keep a straight face? Actually what the chart shows is that Millennium thinks that the coal market is endless, it will never be saturated. No climate agreements will make a difference, not even price will make a difference. Millennium thinks the world will go on burning coal at the same rate for 20 years into the future. Millennium thinks that citizens in Japan, China, Korea, Taiwan will never figure out the connection between burning 44 million tons of coal a year and the heat waves and storms and damage to their local environments. Millennium thinks they'll never want to do anything to protect themselves from the arsenic, lead, mercury. We'll all continue to see video clips of Beijing darkness, wearing paper masks, keeping their asthmatic children inside. My point is they're not going to take it any more than we are. This is the end of coal. Let's be proud of ourselves. Join in and specify no action. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001601***

Received: 5/31/2016 5:38:56 PM
Commenter: Vicki Poelman
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State's role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

Submission Number: ***MBTL-SEPA-DEIS-0001603***

Received: 5/31/2016 5:40:15 PM
Commenter: Vicki Poelman
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State's role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

Submission Number: ***MBTL-SEPA-DEIS-0002386***

Received: 6/9/2016 6:04:14 PM
Commenter: Bruce Pollock
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I write today in support of Millennium Bulk Terminals coal export terminal. This is a project that is easy to support because it will benefit families both within and outside of its southwest Washington location. The project presents a path to employment for many, let's makes it happen. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it’s time Longview went back to work. This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible. It is time for this project to happen for Longview and Cowlitz County.

Submission Number: ***MBTL-SEPA-DEIS-0001958***

Received: 6/6/2016 2:08:28 PM
Commenter: Robert Pollock
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the opportunity to add my voice to that of others in supporting the environmental study for the proposed port at Longview. The DEIS will present a clear picture of how Millennium Bulk Terminals will proceed in opening and operating this port and the economic, environmental, and social benefits of this project are deserving of approval. Washington is highly dependent on trade, and Cowlitz County desperately needs family wage jobs. An EIS that includes newly-invented forms of navel gazing should not have been necessary for a transportation infrastructure project that will facilitate foreign trade and create good jobs for our community. We need this project to move forward without further delays or unprecedented permit conditions. I urge you not to be swayed by outside fanatics who do not care about our county or our people. The environmental review process for Millennium Bulk Terminals should be held to the same standard as every other port or infrastructure project. We have a very fair and comprehensive process in place, and I question the motives of those who say otherwise. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0001459***

Received: 5/30/2016 11:29:36 AM
Commenter: Linda Pool
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

We have burned coal for eons and have learned the hard way the terrible consequences of burning coal: 1-Increased greenhouse gases leading to global warming and climate change 2-Increased mercury in our oceans affecting all sea life 3-Increased acidification of our oceans due to increased carbon dioxide fallout from the air 4-Increased incidences of asthma and other health issues The above reasons alone tell us Do Not Allow the Millennium Bulk Terminal in Longview to be Built. The Draft Environmental Impact Statement for the Millennium Bulk Terminal in Longview states in the Greenhouse Gas Emissions Fact Sheet that even with mitigation measures "The proposed project's remaining projected contribution to greenhouse gas emission impacts which are cumulative in nature, would still be significant and adverse." The permit for the Millennium Bulk Terminal in Longview must be denied.

Pope, Jan (0693)

Submission Number: ***MBTL-SEPA-DEIS-0000693***

Received: 5/23/2016 12:39:24 PM
Commenter: Jan Pope
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough, now it is time to move forward with a fair process for permitting. Thank you for your work to move forward with this project.

Submission Number: ***MBTL-SEPA-DEIS-0000711***

Received: 5/23/2016 1:02:05 PM
Commenter: Lorin Porter
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed Millennium Bulk Terminal would provide. The project would create work right away during construction, and plenty more jobs would stay around to run the terminal. Plus, all of those wages generated would trickle back into our local and state economies. At a time when our state unemployment rates are below the national average, we cannot miss big opportunities for new business like this one. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0002645***

Received: 6/13/2016 12:14:25 PM
Commenter: Jenny Potts
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

SCOPE Law Firm, PLLC
PO Box 22091
Seattle, WA 98122-0091
(206) 420-1590

June 13, 2016

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

RE: Millennium Bulk Terminals-Longview SEPA DEIS

Greetings:

The Draft EIS for the Millennium Bulk Terminal does not provide a reasonably adequate discussion of the probable consequences of the proposed action. In particular, the DEIS does not adequately inform the decision-makers of the project's significant contribution to climate disruption.

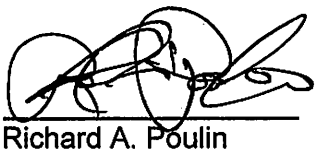
Our civilization has acquired a potentially fatal addiction to fossil fuel consumption. The proposed action is designed and intended to enable that addiction. The coal export terminal is designed for a "minimum 30-year period of operation," exporting 44M metric tons of coal per year, to be burned on the far side of the Pacific. Over the course of 30 years, this totals 1.32 billion tons of coal. Even worse, the impacts of this operation will necessarily include the fuel burned by countless coal trains, and the noxious bunker fuel burned by 840 bulk cargo vessels per year, each making a 9,000 nautical mile round-trip.

But the DEIS does not adequately consider the adverse environmental impacts of 30 years of emissions from coal trains, from ocean-crossing vessels, and from burning the exported coal. Instead, the DEIS arbitrarily considers only the transportation and fossil fuel combustion emissions resulting from operations from 2018 through 2038. Worse, during nearly half of the evaluated time period, the facility will be operating at much less than full capacity. As a result, the analysis only considers ten years of full-capacity impacts – well under half of the 30-year total. But even this analysis is flawed: in Chapter 5, the DEIS designates 2028 as "the first year of full export capacity operation for the coal export terminal." However, this statement is contradicted twice in the "SEPA Coal Market Assessment Technical Report," which states on pages 4-4 and 6-1 that the terminal will start exporting 44 MMT of coal in 2025.

In addition, the analysis of greenhouse gas emissions in this DEIS "does not include emissions from future coal extraction in the Powder River Basin and the Uinta Basin" as a cumulative impact. SEPA requires an adequate discussion of a project's cumulative impacts. Because the DEIS does not reveal or evaluate the global warming impacts of consuming the energy needed to extract the coal without which this project would have no purpose, the DEIS is inadequate.

Very truly yours,

SCOPE Law Firm, PLLC

By: 
Richard A. Poulin

Submission Number: ***MBTL-SEPA-DEIS-0000578***

Received: 5/19/2016 6:21:42 PM
Commenter: John Poulos
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing about the Millennium coal export project. I believe this project is good for the community. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. I'm certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

Submission Number: ***MBTL-SEPA-DEIS-0000060***

Received: 5/3/2016 3:45:04 PM
Commenter: Barbara Poulson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0001936***

Received: 6/6/2016 12:59:30 PM
Commenter: Andrea Powell
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I urge support for a marine port to transport our coal. Coal is natural, and Wyoming coal is high quality and very clean. Coal is a great resource to be used to improve the economic lives of the poorest in our state. When a state is wealthy, it can afford to protect the environment and make expensive choices to improve our lives. But when a state is poor, and citizens are forced to choose between supporting their families and expensive environment improvement choices, the environment loses every time. We all want to live in a clean, beautiful country, so allowing us to use this great NATURAL resource, coal, to benefit other countries in their need for cheap, clean energy lets everyone win. I believe the opposition is spreading a lot of misinformation, either because they are misinformed about the nature of coal and current technologies, or their desire to win closes their mind to reasonable discussion and they continue to perpetuate lies in order to destroy their "enemies."

Submission Number: ***MBTL-SEPA-DEIS-0002596***

Received: 6/13/2016 10:52:19 AM
Commenter: Tom Power
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003034***

Received: 6/13/2016 4:48:24 PM
Commenter: Kyle Prader
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. This project is exactly the kind of economic boost that the state really needs. The benefits are numerous. The terminal would create jobs, generate significant new tax revenue, and help attract businesses to our area. In many ways, it can be a source of continued growth for years to come. It is tough to believe that a project with an obvious upside like this has been held up for so long. Those in charge should view this project for its benefits to the community and see it through to the finish. Our citizens are counting on it. I applaud the agencies work on this permit process. The results will provide a more-than thorough "hard look" at the possible impacts of the Millennium Project in Longview which is needed to keep things moving ahead. Thank you. Sincerely, Kyle James Prader kprader@archcoal.com 82730

Submission Number: ***MBTL-SEPA-DEIS-0002433***

Received: 6/9/2016 8:12:08 PM
Commenter: Lovel Pratt
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for this opportunity to submit DEIS comments. I am a resident of San Juan County (SJC), a property owner, business owner, and a former member of the SJC Council. I am concerned that the DEIS did not address almost all of the scoping comments I submitted. Most significant is the lack of information on project-related adverse impacts to the federally listed as endangered Southern Resident Killer Whales (SRKWs). Project-related increases in vessel traffic and associated noise, coal and/or oil spills, air and water pollution, and adverse impacts to the salmon that the SRKWs feed upon could all adversely impact the SRKW population. SJC's economy is inseparably linked to the beauty of our environment and the health of our marine ecosystems. SJC's current economic bread and butter are visitors, retirees, and part-time residents who have vacation homes in the islands. Tourism depends upon our SRKWs who are the prime driver of our economy. The birth rate of the SRKWs is strongly correlated with the abundance of Chinook salmon. New information shows that abundant runs of Columbia and Snake River Chinook salmon are important to the long-term survival of the SRKW. Since the SRKW was listed as Endangered in 2005, NOAA has funded studies of SRKWs to better understand how they can be protected. A key part of this effort is defining Critical Habitats that are essential for their traveling, foraging, resting, and reproduction. It is well established that SRKWs spend much of the summer near the San Juan and Canadian Gulf Islands, but winter sightings had been rare until a satellite-tracking device was attached to individual whales in K and L pods. This NOAA-funded project has tracked the winter travels (from 2012 to present) of both the K and L pods of SRKWs along the outer coast from the Strait of San Juan de Fuca to Northern California, spending much of their time around the mouth of the Columbia River. Because Chinook salmon is the preferred food of the SRKW, they were likely feasting on upper Columbia and Snake River Chinook salmon that were transiting these waters at the time. Juvenile Chinook salmon use the lower Columbia River for migration and sustenance. Adult salmon must migrate along the Columbia River past the site of the proposed coal terminal. Impacts associated with the proposed terminal – its construction and its operations –are potential threats to maintaining Chinook salmon runs adequate to sustain the SRKW population. I request that the final EIS include a study of impacts to SJC's economy based on the impacts to the SRKW based on the project's direct impacts to this key salmon population. Please address the following impacts in the final EIS: Based on the adverse impacts outlined in the DEIS for the MBTL project, including the adverse impacts from the increased risk of oil spills, to endangered Columbia Chinook salmon, an essential food for SRKWs, in the Columbia River • What is the economic threat from the loss of SRKWs to the economy of SJC and WA State? • What would be the loss of property values in SJC and what would be the loss of tourism and real estate sales from depleted fish and wildlife populations such as SRKWs in the event of a major oil spill in the Columbia River? In analyzing all the impacts above, what would a "worst case scenario" look like in the presence of each of the plausible, compounding factors or events, including but not limited to human errors, storms, earthquakes, tsunamis, and other planned/proposed projects that may contribute to increased cumulative impacts and chance of accidents? What would a "worst case scenario" look like for all the above plausible, compounding factors combined? What would be the estimated damages in dollars, overall and for SJC in particular, if such a "worst case" event happened? Will the MBTL project have sufficient insurance coverage to insure against the "worst case" damages and economic losses? Thank you for addressing these comments in the final EIS.

Submission Number: ***MBTL-SEPA-DEIS-0000792***

Received: 5/23/2016 4:37:35 PM
Commenter: Selden Prentice
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I urge you not to grant a permit for the Millenium Bulk Terminals Longview. Most climate sceintists agree that because of human caused greenhouse gas emissions, we are poised at the edge of global epic environmenal catestrophe. Several aspects of this how this catastrophe would unfold in the Northwest — including a fourfold increase in wildires, loss of critical snowpack, increase in temperature, increase in flooding of densely populated urban areas, increasing acidification of seawater with signiicant impacts to saltwater ecosystems — are documented in the Environmental impact statement. See section 5.8.2.4. The effects of climate change are global in nature — similar and even more extreme catastrophes will playout around the globe. Even with proposed mitigation measures, this proposed project's contribution "to greenhouse gas emission impacts, which are cumulative in nature, would still be significant and adverse." See DEIS's Greenhouse Gas Emissions Fact Sheet page 3. Why then are we permitting a project that will clearly exacerbate worldwide catestrophic environmental damage? The no action alternative is a much better option. Here is why. Alternative energy sources that do not increase greenhouse gases are increasingly available, inexpensive, and capable of meeting our energy needs. Rapid adoption of these technologies is critical to avoiding climate change devastation here and around the world. This project would slow the adoption of these alternative technologies. As noted in the DEIS (Table 5-8-9) this project "would increase in supply" and "decrease international coal prices." Basic economics tells us that these market effects would also slow the transition to clean energy technologies. The DEIS does not, however, provide any analysis of this crictical projected market effect, and such analysis should be included in the final EIS.

Prey, Michael (2950)

Submission Number: ***MBTL-SEPA-DEIS-0002950***

Received: 6/13/2016 3:28:15 PM
Commenter: Michael Prey
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Prey, Michael (2952)

Submission Number: ***MBTL-SEPA-DEIS-0002952***

Received: 6/13/2016 3:29:22 PM
Commenter: Michael Prey
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Price, Beverly (0969)

Submission Number: ***MBTL-SEPA-DEIS-0000969***

Received: 5/24/2016 5:40:45 PM
Commenter: Beverly Price
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing today to express my support for the Millennium Bulk Terminals project in Longview. I am glad for the opportunity to voice my support of this important project. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. This DEIS is being finely crafted. The progress this port represents should not be hampered. It's time to get folks back to work!

Submission Number: ***MBTL-SEPA-DEIS-0003832***

Received: 6/14/2016 1:20:33 AM
Commenter: George Price
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments
Submission Text
George:

Thank you, thank you all for being here. My name is George Price. I was asked to represent an organization I belong to named Indian People's Action. Indian People's Action asked me to be here as an environmental issues coordinator.

I would like to put our input collectively in here; just the fact the basis what coal is doing to our climate and the life on earth. I think that should be enough reason to keep it in the ground, not transport it anywhere. Anybody who's paying attention and looking at how fast this is escalating climate change to an unpredictable level at levels with all the other elements that are being released. Rising sea levels, you can go down the whole list if anybody's honest about that, you would say yes, let's stop all of this.

I'd also like to say let's look at the paradigm shift and deeply question a society that creates incentives for people to write environmental impact statements that are intentionally lying to the people for profit, for money in a society that lives for money. I'm not going to go into my whole historian's diatribe there. I had often wondered what if the people who came from across the ocean, and likeminded people that welcomed innovation in Massachusetts had come to learn instead of to control. It's great. Can we start on the right foot now? I recommend the no action on behalf of Indian People's Action of Montana.

Steve Running: Yes, I want to particularly point out what I see happening in the global coal markets and global carbon cycle science. That's the stage that I work in, global carbon cycles. We, probably a decade ago, first identified really clearly that the biggest single carbon emission by humanity is burning coal for electric power. It became clear to us right at that point that everything else we do in trying to reduce carbon emissions wasn't going to matter at all if we didn't, first and highest priority, quit burning coal for electric power.

That was over a decade ago. It didn't seem like we were making much progress until about the last year. I can finally say that we've had a pretty good year in global policies. Obviously we all know about the Paris Climate Agreement where every nation signed on to a commitment for driving down carbon emissions, and for most countries that first biggest carbon emission is burning coal for electric power.

What's more immediately relevant to us here is that China not only signed the Paris Agreement, but China actually does a 5-year strategic plan for the nation. What a concept to actually plan the future of your nation. We've got learn something here. In the last 5-year plan, China has publicly announced that they will quit importing coal. What we're clearly seeing is that in 2014 and 2015, China's coal imports went down by actual statistics, so they're making good on this strategic plan that they've announced.

They are starting to drive down their purchasing of imported coal. Of course, their 2 biggest sources are Australia and us. They have already announced that they have a strategic objective to quit buying coal. I can't imagine a worse time for America to be building more coal infrastructure when the biggest customer has already announced publicly that they're going to quit buying. This is really almost a no-brainer.

What I also see now in this last year is that the world financial community has really started to catch on that long-term fossil fuel investment, and particularly long-term coal infrastructure investment, is just plain a bad idea. It's a bad investment. You have very high probability of losing your investment with the trajectory of the global economy and energy. When the world bank and Goldman Sachs, I read almost every week another major financial institution announcing that they are getting out of coal investment ... What we see here is the local version of that same decision point.

You would think this ought to be an easy decision, that the last thing the Pacific Northwest would want to do is invest in long-term infrastructure for coal export when a major customer has already announced that they're going to be capping their imports. I think this is to me, at the global scale that I work at and study and follow, this really should be a pretty easy decision then. This is certainly not a terminal that we want locally, but that even makes any sense in terms of a larger financial picture. It just doesn't make sense one bit. I think that's what I want to leave with you on this topic. Thank you.

Paul Smith: I'm really happy to get a chance to comment on the health implications of the increasing coal shipments by rail for our communities and others. It's easy to make the case that negative health impacts with coal will occur because they've been occurring for the last several hundred years. There's no reason to think a little bit more is better.

I hope to stress the health threats local to Missoula and also stress that this new threat will be greatest on the vulnerable, including children, infants, the unborn, and the elderly. I also have a list of references that I always feel nervous talking and making statements without. If anybody wants the list of the references that at least give the health implications, please see me. Because I take care of children and infants with lung disease, obviously my main concern at the local level is the increase in air pollution from these diesel fumes, coal dust, and worsening climate change.

Data is substantial showing that coal trains do increase bloom concentrations. Diesel emissions are recognized as carcinogens, which was previously noted, and contain toxic substances such as polyaromatic hydrocarbons and particulate matter or PM. Coal dust also adds to air pollution in the form of particulate matter. Of the 6 criteria of air pollutants that the EPA is mandated to regulate, particulate matter is perhaps one of the easiest to track and to correlate with health effects.

It's generated a vast amount of medical literature. We know there is PM increase as public health worsens. We also know that when we lower particulate matter, population health improves. That's an important concept and lends significant credibility to particulate matter being culpable, and justifies action that lowers air pollution. Particulate matter leads to lung damage and diseases such as asthma and COPD. Children are at the highest risk because their lungs are developing and they have more life years of exposure.

This often worsens over decades from accumulating scar tissue along the airways by repeated injury. We have no cure for asthma. For today's living asthmatic children, they may end up being tomorrow's asthmatic cripples. In health, particulate matter also leads to diseases distant from the lungs such as heart disease, stroke, and cancer and even adverse effects on pregnancies and fetal tissue. Infants born to a mother exposed to high concentrations of particulate matter are born smaller, and with impaired lung function.

These more systemic effects outside of the lung happen in part because fine particulate matter can also cross pulmonary system directly into the circulation and they release whatever poisons they contain. Missoula already struggles with air quality in a large part because of our valley inversions that attract pollutants. Despite strong efforts to decrease particulate matter, we often, here in Missoula, are close to the prescribed threshold by the EPA for particulate matter.

There is no safe lower threshold. The more time one spends in high exposure of particulate matter, the greater the effects. Again, this is of special concern to children. Another health concern with coal dust is increased chance of train derailments. You might recall an article in the Missoulian last year quoting the Department of Transportation estimating that there would be over 10 derailments per year in the US of trains carrying nothing but ethanol and oil cargo alone. Missoula is a very populated area. It's time we realize that with only 2 hospitals in our town, we would struggle to handle the type of derailment disaster that hit Quebec killing 47 and devastating a small

town.

Then finally the effects of coal combustion on climate change are already significant here in Montana. As it was noted, we've already come through 2 of the warmest years on records and the warmest April on record. Our snow pack is already lower than normal this year and it's disappearing. Our farmers and ranchers are threatened. Increased forest fires and hot weather will again threaten our health and our children's health.

By way of closing, one of my favorite quotes when giving a talk like this is from CF Elliot in 1909. He was then secretary of Anaconda Copper Mining Company. He stated, "We have the perfect right to carry on a legitimate business and if incidentally we should pollute the atmosphere nobody has the right to complain until specific damage gives them a cause of action." This statement really describes the position that we're in as a company.

We can't stop a process legally until we can show harm. By then, the ground, the air, and the water are contaminated, and our children are sick and it's too late. So ask yourself when we're coming through these discussions what angles are we heading in? Is the public being shouldered with the responsibility to prove harm or is the impetus on the industry to prove there's no harm? Harm to health has already been shown. There is specific cause for us to halt more pollution.

John: Good evening. I'm John Woodland. I retired in January as the Superior, Montana Fire Chief. I'm speaking from my background in emergency services, I do speak for myself. Superior is one of the many small towns along the rail line that this project will negatively impact. Emergency services and access to many of my district's neighborhoods require crossing the tracks. That's true of many other towns along the rail line. This is what's hauling our water supply across the tracks.

I personally waited at a grate crossing for a train to pass while on an emergency service response. This proposal lacked the train traffic. It increased the likelihood emergency services will be negatively impacted in communities all along the tracks. The tracks in Mineral County in places are built right along steep mountainsides next to the Clark Fork of the Columbia River. Trains fall off these tracks sometimes into the river and not that infrequently.

In my 10 years as the fire chief there have been 2 trains in the river in Mineral County. One visible from my home, included empty oil cars, and the other dumped Boeing fuselages into the Albertan Gorge. More traffic means more wrecks. More traffic will also mean more pressure not to hold up the trains for maintenance work which means yet again more wrecks. For Montana, Eastern Washington and Idaho, it also means less access and higher prices to ship agricultural products. For emergency services, today the 800-pound gorilla in the room is climate change.

If you don't think that's emergency service issue just look at the newspaper for the last week, at the evacuation of between 80 and 90,000 people from Ft. McMurray in May in

Northern Alberta, months before there's supposed to be a fire season in that part of the country. This is the future for the entire inter-mountain west if we don't act decisively now with climate change. We cannot continue to invest in fossil fuel projects, such as Longview, and have any chance of limiting the worst impacts of climate change. I urge you to say to no to the Longview Coal Port and yes to acting decisively on climate change now before it's too late.

Michael: My name is Michael Daniel Bolt. I'm a student at the University of Montana. I'm running for House District 98, Montana State District. I think preventing any new coal mining is the best choice. I'm also interested in bringing ideas of increasing government control over the natural resource industry including the coal industry. I believe government run operations of the coal industry would allow us to shut down that industry more responsibly and make any future natural resources extraction use projects really more beneficial to the Montana people. That's the main concession. That's all. Thank you.

Carolyn: Hello, my name is Carolyn Walker. I used to be Carolyn Alderson. I lived along the Tongue River for 20 years of my life. I raised my 3 children there. There is an interesting story about a law and a regulation that actually stopped something. When I lived down there, the Northern Plains Resource Council, I was part of it, was just beginning. That's when you all heard of the Tongue River Railroad. The Tongue River Railroad was thought of and started because there was a mining plan for that area, right on the Tongue River. It was called the Montco Mine.

Well there's a nice picture of me shaking hands with President Carter in 1977 at the signing of the strip mining bill. In that bill there's a piece of the legislation that says, "There shall be no strip mining on Alluvial Valley Floors." The Montco Mine was right on the Tongue River. It caused some difficulty in the community. I just wanted you to know that there are ways to use legislation and rules to stop bad things from happening. My recommendation is that we recommend no action on the Longview Port.

Jim: My name is Jim Parker. I live in Missoula Montana. As a Montanan along the rail corridor between the Powder River Basin mines and the proposed terminal I oppose the Millennium Bulk Terminals because of the associated increase in coal train traffic through my community. The increased coal train traffic will bring with it increased air pollution and health risks from increased coal dust and diesel exhaust and increased noise pollution.

In addition, the increase in coal traffic through my community will reduce access across the tracks and cause traffic delays for citizens, commuters, for emergency response vehicles when there's a medical emergency or fire, or a need for police. The additional train traffic will also provide greater potential for vehicle collisions with trains and for pedestrian accidents.

As a Missoulian and Montanan, I'm asking that the EIS fully analyze and consider the impacts of this port and the increased coal train traffic would cause here in Missoula and across Montana especially as it relates to the above sited impacts. The proposed project’s impacts are real and significant to Montanans and are connected in cumulative

result of what happens if this project is approved.

The EIS prepared by the court in the Washington Department of Ecology in Cowlitz County must include all the connected and cumulative impacts in Montana that will result if the MBTL facilities are approved and constructed. These include the significant connected and cumulative impacts on the project all the way back through Montana to the Power River Basin Coal Mines in Montana and Wyoming.

The increased rail traffic in Montana must be addressed, analyzed, and its consequences fully considered in the EIS. More trains in Montana will mean an increase in the amount of airborne pollutants, from diesel engines as well as from coal dust. Medical studies have shown a clear link between both diesel air pollutants and coal dust and disease.

While those with chronic disease, the elderly, young children, and pregnant women are most at risk, the health effects from particulate matter exposure may occur years later. Even healthy individuals need to be concerned. These issues must be addressed, analyzed, and their consequences fully considered in the EIS. The MBTL facility will directly lead to an increase in the burning of coal. The link between increased coal burning and associated public health problems cannot be ignored and should be included, analyzed, and the consequences fully considered in the EIS.

Finally, because the sole purpose of the MBTL facility is to facilitate the shipping of coal being transported from the PRB to its final destination in Asia, where it will be burned for energy, I also believe that the EIS must fully consider the long term and direct effects that this action will have on the global climate.

In conclusion, I strongly oppose the proposed Millennium Bulk Terminals Longview facility. The connected and cumulative impacts to Missoula, and all of Montana, from the proposed facility, are real and significant. The EIS prepared by the co-lead ggencies for this project must address, analyze, and consider all the connected and cumulative impacts this proposal will have on Montana. Please reject this proposal and take no action.

Thank you.

Harold: I'm Harold Hoem from Missoula. The whole town of Butte Montana went through a long period of horrible air quality early in this century because of ore smelting. Read a book called Smoke Wars. People sickened and then died especially underground miners like my grandfather who was cut down in the prime of life by lung disease. The corporate giants called the air pollution a nuisance. It was deadly. Oh, what a nuisance Biff was to my family.

What are some corporations proposing to do this century later but ship Montana coal overseas so citizens there can get sick and die from nuisance called coal? A friend of mine who was a former coal mine manager says this, "The problem with the coal mining industry is the product is a poison”. We know that CO2 is increasing dramatically. It is now over 400 parts per million. Humanity hasn't seen this stuff but it is affecting climate

change dramatically.

The current wildfire in Ft. McMurray in Alberta Canada caused the evacuation of over 88,000 people. The smoke from each building is hundreds of miles away. Perhaps a wake-up call for Montana. We have rapidly declining snow pack and are facing longer and harder, tired, and more dangerous fire seasons and possibly worse than Iroquois. For sure a nuisance for residents and a real downer for tourism. The DEIS gives Montana a scant potential.

They say 16 additional coal trains a day would go through Missoula that cite inflated numbers for existing traffic of 25 to 28 trains. We currently see only 13 to 15 trains. 16 more trains would double current traffic. The effects would ripple down all the impacts of safety risks, derailments, noise, dust, the laser crossings et cetera. They should know where our current capacity is and give assurances that deficiencies will be mitigated. My last word , bring down CO2 emissions by switching to renewables. Vote no action. Show the US means business in climate litigation.

Gary: I'd first like to thank Northern Plains and the Hoems in particular for it, and Les Anderson coming all the way from Longview to speak here. The speakers, it's been a very nice haven. Thanks for this opportunity to comment. Hi there, I'm Gary Mattson. I live in West Riverside, which is a suburb of Milltown. I really seriously, if the most serious effects of this port certainly have to do with health and climate change.

For those reasons, I am just baffled that so many people either ignore the science, or deny the science, or simply don't know about the science. I cannot understand why we have so many people that are not supportive of recognizing climate change demand. Some of the effects aren't realized. I can see in my community. Milltown has one singal entrance to it across on the south side of Powder River, there is one railroad crossing.

If that railroad crossing was blocked, no emergency services can occur. Our fire chief manager will recognize that concern. In Missoula County that's 10. That has a significant impact. The additional of 16 trains would really be a big impact on emergency services. For multiple reasons, I would strongly recommend that no action alternative.

George: Thank you, thank you all for being here. My name is George Price. I was asked to represent an organization I belong to named Indian People's Action. Indian People's Action asked me to be here as an environmental issues coordinator.

I would like to put our input collectively in here; just the fact the basis what coal is doing to our climate and the life on earth. I think that should be enough reason to keep it in the ground, not transport it anywhere. Anybody who's paying attention and looking at how fast this is escalating climate change to an unpredictable level at levels with all the other elements that are being released. Rising sea levels, you can go down the whole list if anybody's honest about that, you would say yes, let's stop all of this.

I'd also like to say let's look at the paradigm shift and deeply question a society that creates incentives for people to write environmental impact statements that are

intentionally lying to the people for profit, for money in a society that lives for money. I'm not going to go into my whole historian's diatribe there. I had often wondered what if the people who came from across the ocean, and likeminded people that welcomed innovation in Massachusetts had come to learn instead of to control. It's great. Can we start on the right foot now? I recommend the no action on behalf of Indian People's Action of Montana.

Dave: Hi, my name is Dave Dittloff. I'm the regional representative for National Wildlife Federation. Most of you are probably aware of National Wildlife Group. We're the folks who put on Ranger Rick Magazine. That's our biggest identifier here with the kids.

In 3, 4 years that that's going to take, yet there's nothing coming back up the streams in order to spawn salmon. The impacts are almost certainly down to relating to some of the impacts here. Last year, last summer's conditions literally had most of the species dying, most of the adults coming back to the rivers and streams here to the headwaters of the Columbia River Basin died due to high temperatures, directly related to climate change.

I want to talk a little about, quickly here's something that hasn't been hit hard today, talk about wildlife. It starts right from the beginning. You look at the mine site here, the direct habitat displacement, the coal recommendation that follows it, that impacts wildlife. If you look at what happens on the mine sites with water, that impacts fish and wildlife. The next connector we look at has it transferred over? We look at the trains. There's been a lot of talk about human health and consequences here which are really important. Those same impacts are related to wildlife for particularly the fisheries here. That coal dust gets in the streams. There's mercury concern with it here and other neurological issues are a concern.

Mercury is bad for people eating the fish as well. We've got dozens of streams and multiple dozens of lakes in Montana that had mercury consumption warnings here. You can only eat so much of the fish. That's an impact to wildlife. You look at the ports, same thing here. The direct construction of the ports, this place is habitat for sure. That has real consequences to the fisheries. You'll see salmon come in and out of the ocean as well here.

Lastly, climate change, I got to talk to you about salmon. Name a critter, even the biggest critters, white tail deer, elk, etc. that think generalist that those are for generalist. There's impacts here. More and more research that's done it's really impact of Montana's out pour heritage, it's culture, what we like to do here whether it's sightseeing, hunting, fishing, what have you here. Fishing is a multi-billion dollar industry in Montana and the Pacific Northwest. There's economic reasons associated with wildlife as well here. I appreciate it. No action alternative makes sense for wildlife.

Dave Jones: Hello, my name is David Jones. I've been a fly fishing guide in Montana for over 30 years. Dave just inspired me to get up here and talk about what I see in my career fishery that I work primarily in. My season has been shortened by an average of about 6 weeks in the 30 years I've been doing this. We don't have clients in August anymore at all because of

the low flows. Half the time our rivers are shut down because we have to worry about railing over there. Anybody that watches the forester around in the spruce moss and the beetle kill, it's just obvious that Montana is being really affected. We mentioned the economic impact, but really we're talking genocidal, ecocidal impacts for climate change. We ought to think in those terms really. This is an emergency. I recommend no action on the terminal. Thank you.

Steve: Hi, my name is Steve Schwartz. I live here in Missoula. I'm a professor interior of the Department of Communication Studies at the University of Montana. I teach and do research in environmental communication. No matter what the coal industry says about the free market, their goal is to get government on their side to make the market work for them whether it's supporting carbon cash receipt frustration, whether it's blocking the clean power plan, or supporting coal export infrastructure like MBT as a goal. It's past time for us to use our voice to remind government agencies who's side they need to be on and who's interest they need to represent.

The connected and key note we've heard about tonight on public health and safety, on air, land, and water, on wildlife, and on climate change are common in house. They're shared by the residents of the Pacific Northwest, shared in common by the people who live in Washington and Idaho and here in Montana. We all deserve a voice in this decision. For that reason, I want to thank all the organizations that have made this opportunity possible for so many of us to express our voices. To protect the commentators in the Department of Ecology, to take no action, thank you.

Jim: My name is Jim Roach. I've been a Missoula resident for 45 years. I don't understand why it's draft Environmental Impact Statement doesn't address impacts for rail traffic in Montana. That seems sort of ridiculous. It seems like a rip off. On behalf of my family, and my friends, and a lot of people that I know are neighbors, I just want to say we don't want any more coal dust. We don't want any more diesel fumes. We don't want any more threat of derailment. We don't want traffic complications from increased rail traffic. We don't want the noise.

Most of all we don't want the climate impact. We don't want the endless smoky summers. We don't want the low stream flows and the sick fish. We don't want the reduced fishing opportunities. We don't want increased beetle kill. We don't want disappearing biodiversity. We don't want damage to agriculture. We don't want the drought. We don't want climate refugees. We don't want shut downs of skiing areas. We don't want this action, no action. Thank you.

Claudia: My name is Claudia Narcisco. I am speaking for myself today. When I was trying to find some things that I was going to speak about, I found an old letter that I had written in I guess November 2013. There goes my letter. I had it on my phone and mailed it to myself. Anyway, it was hard enough to read. I emphasized that connection actions between the mine and the port and Asia and the impacts on climate change and how it would cycle back to us.

I requested that they consider this. I cited a section of the National Environmental Policy

Act. I believe it was section F2 or 2F that specifically directed agencies to consider international ramifications of actions which is not something that we normally associate with, but it's just that it was our responsibility to do that. Obviously those things were not necessarily done, as far as I could tell, to this point.

I hope that's considered.

Submission Number: ***TRANS-PASCO-M1-00068***

Received: 6/2/2016 12:00:00 AM
Commenter: Bart Probst
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Bart Probst (phonetic). I live in Walla Walla, and I attend the church that Pastor Nathaniel is a pastor of. Every Sunday our congregation pledges to practice stewardship of God's creation.

And this project fails that test. The benefits of this project are going to be localized and in all probability be short term. The liabilities, the externalities, the costs, the drawbacks of this project will be spread clear across the state of Washington and far, far into the future.

Most of the benefits are easily calculated. Most of the drawbacks are unknown and unknowable. The three largest coal companies have gone bankrupt leaving the taxpayers of this country holding the bag for millions of dollars for reclamation projects to return the environment to what it was beforehand.

This is a dying industry. Depending on this industry for financial support is not terribly wise. So I urge you to deny this permit. Your children will thank you. Your grandchildren will thank you. And the desperate investors who support this project will probably thank you, albeit grudgingly.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000031***

Received: 5/1/2016 4:20:05 PM
Commenter: Susan Proszek
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base. Sincerely, Susan Proszek

Submission Number: ***MBTL-SEPA-DEIS-0000848***

Received: 5/24/2016 12:50:33 PM
Commenter: Raymond Pryor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let’s get Millennium Bulk Terminals to begin hiring and exporting. Thank you. Sincerely, Raymond Pryor momberto_2@hotmail.com 59457

Submission Number: ***MBTL-SEPA-DEIS-0000400***

Received: 5/17/2016 6:19:01 PM
Commenter: Earline Pset
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The Millennium Bulk Terminals proposed coal export terminal should be approved and the port should be allowed to move forward. It's good for Washington and her neighbors. Right off the bat, Millennium began working with the Department of Ecology to clean up the old Reynolds smelter site. In addition Millennium is working to restore the natural habitat along the Columbia River, it has removed and replaced old pilings, and has brought the existing dock up to minimum standards. Why has this project’s permits for the export terminal taken so long? All this delay has done is postpone the cleanup and restoration of a great industrial port site. Millennium Bulk Terminals in Longview is offering to create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.

Submission Number: ***MBTL-SEPA-DEIS-0001967***

Received: 6/6/2016 2:15:12 PM
Commenter: Kody Puderbaugh
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. Thank you for your work to move forward with this project.

Submission Number: ***MBTL-SEPA-DEIS-0002557***

Received: 6/12/2016 6:31:48 PM
Commenter: Barbara Puigh
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing to ask you to deny the permit to build a facility to export coal in Cowlitz County WA. I live in the Tri-Cities WA where the proposed train route will travel through to bring coal from states to the East to the port for transport to places like China. I am a resident of the area (and world), a retired CPA and a person influenced by Pope Francis' encyclical on care of our earth. This proposal will bring congestion and pollution to my neighborhood, the Pacific Northwest and the world. The costs that will likely need to be supported by our community will not be offset by revenue from the transport. In addition, coal is a major cause of pollution in the world. Photos of residents of China wearing face masks are frightening. Instead, we should be supporting more research into clean energy. We care about the Chinese, too! The frightening train derailment in Oregon last week, carrying oil trains, are a good reminder of the possible (inevitable?!) accidents that will negatively impact communities, the Columbia River and other rail traffic. Thank you so much for this very thorough process to get community input! Sincerely, Barbara Puigh Richland, WA

Submission Number: ***MBTL-SEPA-DEIS-0002353***

Received: 6/9/2016 5:37:02 PM
Commenter: Shawnna Punteney
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let’s be clear â€" the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project â€" without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0000805***

Received: 5/23/2016 5:20:13 PM
Commenter: Lance Pyles
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Global climate change is the greatest threat humanity has ever faced, this is a time to move to cleaner forms of energy, not keep investing in dirty fossil fuels. This will do nothing but damage our beautiful mountains and oceans with dirty coal dust. This project cannot be allowed to continue.

Submission Number: ***MBTL-SEPA-DEIS-0000347***

Received: 5/11/2016 10:20:27 AM
Commenter: Neil Quarles
Organization:
State: Texas

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It is imperative to our environment to prevent construction of these coal terminals. As a fly fisherman who travels the western states, I have seen pristine wildlife habitat and great fisheries that were destroyed due to coal mining. Continuing to mine for export what we deem to dirty to use domestically is reckless and shows a blatant lack of consideration of the impacts, in fact, a blatant lack of consideration of anything except corporate profits. Coal mining destroys natural habitats, and the coal terminal will damage the beauty of the state of Washington. What effect this will have on the tourism industry, on fishing, on people's desire to live in Washington, I can't say. However, the public health effects of moving more coal through the state and the global pollution the burning of coal produces should be enough to reject this desperate attempt by corporate interests to prop up an antiquated and destructive industry.

Submission Number: ***MBTL-SEPA-DEIS-0000128***

Received: 5/7/2016 11:28:48 PM
Commenter: Ray Quiaenberry
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm emailing in opposition to the project. With Alberta on fire, the oceans acidifying, the glaciers melting, and the warmest recorded years since records have been kept, it is utter foolishness to keep going as if nothing is happening to the planet. Also, if this project does go forward, it will have to shut down almost as soon as it starts since we can't keep burning this coal if all of us want any kind of decent future. It would be cruel to hire workers and then take away their jobs. The only moral thing to do is not to even start. I used to worry about climate change and its intact on my grandchildren. I was wrong. The impact is here and now, and will only get worse with this project. Thanks Ray Quisenberry

Submission Number: ***MBTL-SEPA-DEIS-0002639***

Received: 6/13/2016 12:03:28 PM
Commenter: Kendra Quick
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I support this coal terminal. Coal train traffic on existing tracks is not going to adversely affect the environment. Coal power generation is most cost effective and reliable. The NGOs are trying to kill the coal industry which has long been the backbone of this country. These companies have large investments in the coal reserves and if American's don't want the coal burned in the US then companies are going to have look elsewhere for coal sales to recoup their investment. The money spent fighting free enterprise would be better spent working on Carbon capture technology. I, for one, am not willing to have my standard of living reduced and believe that if coal shipments to other countries can improve the standard of living of the world overall, everyone should support coal exports.

Submission Number: ***TRANS-LV-Q2-00021***

Received: 5/24/2016 12:00:00 AM
Commenter: Eileen Quigley
Organization: Climate Solutions, Deputy Director
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. My name is Eileen Quigley. And I am deputy director of Climate Solutions, a northwest nonprofit organization that works on solutions to global warming. I ask that you consider two key points in your deliberation over the Millennium Bulk logistics coal export terminal. First, we must stabilize our climate. And we cannot do that if we export Powder River Basin coal. The proposal before you would send 44 million tons of coal per year to burn in Asia, which would increase carbon dioxide emissions by 37.6 million metric tons, according to the Draft EIS. That is equal to building at least five coal-fired power plants or adding eight million passenger vehicles to the road. Coal export of this magnitude would make it virtually impossible to stabilize climate pollution at the level required to keep the planet from warming beyond two degrees Celsius, which is the maximum amount of planetary heating compatible with life as we know it. Second, while this project appears to offer short-term economic opportunities, it is out of sync with the global movement away from fossil to clean energy. With Northwest coal exports to China and India blocked to date, these countries have increasingly turned to renewable sources of energy to power their economic development. In 2015, for the first time global clean energy outpaced fossil fuels in investment and deployment. We must focus our efforts on the energy of the 21st century. And not become the middle men for the dying industry of the past, which is coal. Coal export would bind us to a global economic development strategy that is fundamentally incompatible with climate stability and economic opportunity. We can and must do better than exporting coal. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000405***

Received: 5/17/2016 6:24:10 PM
Commenter: Robert Quigley
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our economy and our families are suffering. We can do something about this by supporting the proposed port at Longview that will put people to work quickly and will keep them gainfully employed for years to come. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! I applaud the agencies work on this permit process. The results will provide a more-than thorough "hard look" at the possible impacts of the Millennium Project in Longview which is needed to keep things moving ahead. Thank you.

Submission Number: ***TRANS-LV-M2-00030***

Received: 5/24/2016 12:00:00 AM
Commenter: William Quinn
Organization: Warm Springs Tribe, Member 797
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is William Quinn (phonetic). I'm from the Warm Springs Tribe. My enrollment number is 797. I'm here today to advise that the coal is nothing -- it's nothing that is good for us. You know, we've been seeing the decline of our fisheries for years now.

I started fishing over 30 years ago -- about 40 years ago almost now. And there were a lot of fish then. But years back when there was Celilo Falls, there were millions of fish. You know, we have to deal with this. We have to live with whatever decisions are made that affect our native people.

And I want to advise no. No action on this, because I want to see our quality of life come back up again where it should be.

God bless you.

Submission Number: ***MBTL-SEPA-DEIS-0000471***

Received: 5/17/2016 7:41:16 PM
Commenter: marion quinton
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium's proposal. Now that the rail corridor has been studied, now it's time for progress on the Millennium project! Thank you for your consideration. I look forward to seeing this project come to reality.

Submission Number: ***TRANS-LV-Q2-00013***

Received: 5/24/2016 12:00:00 AM
Commenter: Ray Quisenberry
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Ray Quisenberry, and I'm in Salem. And the reason I came here today is to oppose the proposed terminal. And my thinking has always been all those proposals we've been seeing recently is that there seems to be no point in adding infrastructure for fossil fuels if we have to be off of fossil fuels within the next number of years in order to avoid catastrophic climate change. It just seems silly to spend this type of money on those types of projects when we should be spending money on reviewable energy and making the environment better, not worse. There's no point in people starting jobs only to turn around in four, five, six years and tell them they can't do this job anymore. That seems terribly cruel to these folks that need a job, want a job, and are trying to get a job to then have to turn around and say, well, your job goes away. It leaves people in a lurch. And it is a terrible, cruel way of trying to move the economy forward. We should go ahead and start with clean jobs, jobs that will be there in ten, 20, 30, 50 years. So thank you very much.

Submission Number: ***MBTL-SEPA-DEIS-0001272***

Received: 5/26/2016 6:32:13 PM
Commenter: Carl Rabe
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The Millennium Bulk Terminals proposed coal export terminal should be approved and the port should be allowed to move forward. It's good for Washington and her neighbors. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn't have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0002135***

Received: 6/7/2016 5:27:52 PM
Commenter: Mark Rader
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close and move on to a permit decision. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let’s be clear â€" the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project, without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. I’ll look forward to updates.

Submission Number: ***MBTL-SEPA-DEIS-0001773***

Received: 6/2/2016 4:53:54 PM
Commenter: Shirlee Radike
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Submission Number: ***MBTL-SEPA-DEIS-0002064***

Received: 6/7/2016 4:28:40 PM
Commenter: Shirlee Radike
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough, now it is time to move forward with a fair process for permitting. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Rael, Greg (0853)

Submission Number: ***MBTL-SEPA-DEIS-0000853***

Received: 5/24/2016 1:03:20 PM
Commenter: Greg Rael
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I write today in support of Millennium Bulk Terminals coal export terminal. This is a project that is easy to support because it will benefit families both within and outside of its southwest Washington location. The project presents a path to employment for manyâ€"let's makes it happen. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. I appreciate the agencies’ hard work on reviewing this project. Please don’t let it get bogged down in an expanded scope of review. This old industrial site needs a new life. Sincerely, Greg E Rael raelson_900@gmail.com 82718

Submission Number: ***MBTL-SEPA-DEIS-0002169***

Received: 6/7/2016 6:52:42 PM
Commenter: Jeff Rago
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and should be treated as such. An environmental review of this time and scope should not have been needed to redevelop an old smelter site. The Draft EIS is sufficient, it's time to move forward. The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you.

Submission Number: ***TRANS-PASCO-M1-00030***

Received: 6/2/2016 12:00:00 AM
Commenter: Dina Rainey
Organization: Millennium Bulk Terminal
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Dina Rainey (phonetic). I live in Kelso, Washington and I work at Millennium Bulk Terminal. I've worked there for five years cleaning up a delipidated old brownfield site. I can assure the lady that spoke a couple of people before me that Millennium will do as the Ecology asks them to do and they will follow all the rules as we have been given. We have a very good environmental record. And that we're very proud of.

I have been involved -- personally involved in the community outreach in our area. There's a tremendous need. The thing that these people need most is family-wage jobs. There are -- there's a study out there that says there are 30,000 young people between the age of 16 and 24 in the five-county area, northern Oregon and southern Washington, that don't have jobs and they're not in school. This means there are 30,000 people living below poverty or living with mom and dad.

Our coal accounts for about 40 percent of the world's electricity, 33 percent of the electricity in the United States. This coal will be harvested and it will leave the Powder River Basin.

Like the gentleman that spoke several people ago, I would rather it be in Longview than in Canada. And I appreciate the work that you have done. The 4,000 pages is very thorough, and thank you for being here.

Submission Number: ***TRANS-LV-M2-00055***

Received: 5/24/2016 12:00:00 AM
Commenter: Dina Rainy
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening. My name is Dina Rainy (phonetic). I live in Kelso. Our environment is important to our quality of life. But equally important is the ability to make a living. For more than five years Millennium has proved they are responsible as they have cleaned up an antiquated industrial site recycling, repurposing, donating that which was unusable and responsibly disposing of that which was unusable.

For more than four years and over 3,000 pages in a thorough Draft EIS I feel the regulators have done their part in ensuring that Millennium will be a responsible corporate partner. The direct and indirect jobs will be helpful to our community's economy.

But the ability to have a reliable source of energy for a developing country is equally if not more important. I've never really considered how I would manage without electricity and I'm sure my kids couldn't manage because they have their computers, their cell phones, their electronic games, TV, hair dryers, 20 minute hot showers.

Then I think about not having a light over my dinner table or a clean, safe way to cook and preserve my food. And think about the sanitation that these countries need. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. This project should be allowed to move forward.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001000***

Received: 5/24/2016 5:58:31 PM
Commenter: Arne Rajala
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. Coal exports are a huge opportunity for the Northwest. The infrastructure coal companies are creating will expand trade of all kinds, from apples to software. At a time of increased competition from both West and East Coast ports, Washington needs to seize these opportunities to expand trade and create thousands of family-wage jobs. This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible.

Submission Number: ***MBTL-SEPA-DEIS-0000116***

Received: 5/6/2016 4:00:46 PM
Commenter: David Ramenofsky
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The noise from additional trains would be significant through Seattle - not just near the proposed terminal site. It is important to realize that running these extra trains will significantly degrade quality of life for thousands of people living in homes along the railroad tracks from Seattle up to Bellingham.

Submission Number: ***TRANS-LV-M2-00117***

Received: 5/24/2016 12:00:00 AM
Commenter: Linda Ramero
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi, my name is Linda Ramero (phonetic). I am from Vancouver, Washington. And this greatly affects me. I've spent a lot of hours, a lot of weeks getting the trains to not go through my town and into port in our own town. And quite honestly if you think you're going to put your trains through my town it's not happening.

But with that being said, one of the things I would like the Department of Ecology to consider is with rising water, with the possibility of floods, how close is all of this coal to that water? If there's one flood, is it just all down the river?

I wasn't going to speak today, so I do apologize that I don't have notes and that I'm not prepared, but something that my son said drove me to it. And that is no action is not inaction. And the desperation that people feel because of -- it's like my son said, Why are they all self-centered? And I tried to explain they are just desperate. Instead of offering really cruddy jobs at a lot of cost, why hasn't anyone in your council or the financial planner that spoke earlier consider what I do, even.

I work for a call center. I work for a university on the east coast. I have my house paid off, my car paid off. Yes, to the person who thought I didn't have a job. It's a good thing. And all of my money goes right back into Vancouver. So I'm bringing Virginia tax dollars here.

It's a great idea. Low commute. I don't commute at all. I get to work from home, be there for my kids when they get home. I have three college- bound scholars. So thank you very much. Please don't do this.

Submission Number: ***MBTL-SEPA-DEIS-0000084***

Received: 5/5/2016 9:22:05 PM
Commenter: Gena Ramey
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. Cowlitz County has a chronically high unemployment rate. There are environmental impacts of building trades and longshore workers having to travel as far as the Port of Seattle for work on a daily basis, instead of going to a job at Millennium. Let’s keep our jobs local! We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage? Thank you, Gena Ramey

Submission Number: ***MBTL-SEPA-DEIS-0001002***

Received: 5/24/2016 5:59:42 PM
Commenter: Gena Ramey
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

For more than five years Millennium has proved that they are responsible as they have continued cleaning up an antiquated industrial site; recycling, reusing, repurposing and donating that which was usable and responsibly disposing of that which was not usable. Staying committed to a project that has taken far too long to permit. More than four years and now more than 3,000 double sided pages in a thorough draft EIS; I feel that regulators have done their part in assuring that Millennium will be a responsible corporate partner. Their honesty and commitment should no longer be in question, but there are those who are anti-coal who continue to point fingers and say negative things speaking out against the project. It is important that regulatory agencies keep the playing field level by being fair and consistent. Please consider public comment in the context it is presented as often emotions not facts are tied to these comments. I have personally heard negative comments made from people who are paid to speak out against the project. The permitting process for this coal export terminal should be similar to other export terminals.

Submission Number: ***MBTL-SEPA-DEIS-0002380***

Received: 6/9/2016 6:00:58 PM
Commenter: Gena Ramey
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
The draft environmental study for Millennium Bulk Terminals coal export facility was sufficient. Please move forward. There are many benefits of the project that the community is waiting for. Please commit to a timetable for the issuance of a final EIS. Ecology’s SEPA Rules require a final EIS to be issued as close as possible

Submission Number: ***MBTL-SEPA-DEIS-0000112***

Received: 5/5/2016 10:00:30 PM
Commenter: Steve Ramey
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. Unlike many port operations, Millennium occupies a location without immediate residential neighborhoods, AND it is an existing brownfield site. It should be understood that alternate locations do not exist for situating an export coal facility with the necessary water and rail access. Thanks, Steve

Submission Number: ***MBTL-SEPA-DEIS-0002235***

Received: 6/8/2016 1:00:16 PM
Commenter: CB Ramkumar
Organization:
State: Outside the United States

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The very premise of the opening justification for this project is flawed. It states (Point 2.1 of Chapter 2) that 'the growth of Asian market demand for U.S. coal is expected to continue' which is a flawed assessment. Many Asian markets are moving towards renewables, and coal based power plants globally are turning into loss making units.

Submission Number: ***MBTL-SEPA-DEIS-0002158***

Received: 6/7/2016 6:44:03 PM
Commenter: Anthony Ramos
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. GHG from the use of coal and nationwide rail capacity should not have been included in this study, but now that they've been included and thoroughly studied â€" it's time to move this proposal forward! The draft EIS to evaluate Millennium Bulk Terminals proposed Longview project should be kept within reason. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with the process in a timely manner. It's the fair thing to do.

Submission Number: ***MBTL-SEPA-DEIS-0003003***

Received: 6/13/2016 4:30:27 PM
Commenter: Allen Randall
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***TRANS-PASCO-M2-00021***

Received: 6/2/2016 12:00:00 AM
Commenter: Randy
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Hello. My name is Randy.

I had a recent visit to Washington State University Laboratory for Atmospheric Research.

We actually do things that are involved in this. One of the projects that I worked on was application of diesel exhaust, which the research is coming out now. But it says that the sunlight can change these chemicals that are being put into the air into more harmful chemicals. That's part of why -- and this particulate matter chemicals coming in and a person like me, who has sensitive lungs, it really affects me. I am very -- this last year, I suffered from a lot of things from gout to other things, and it's all because of the dust in the air. I'm just a very sensitive person to that kind of thing.

I don't believe that these coal trains should be here. It's going to spread dust all across Washington State plus other states. It doesn't make sense to put all of these chemicals in the air that are scientifically proven to have adverse affects on the atmosphere.

Not only the atmosphere, but the health of people. Imagine like your child, if your little child is born with sensitive lungs and asthma, and you lived near the tracks. Okay, you know, that makes a whole lot of sense. Your kid is going to be getting a lot of bad stuff in their lungs.

I'm just curious, out of everybody in blue, how many of you are going to work at this place?

EVENT HOST: I ask that you, please, address the co-lead agencies.

I don't believe that this is good for -- it may be good for our economy but not really. It will bring a few jobs that -- anyway, I'm going to stop rambling. Thanks everybody.

EVENT HOST: Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001785***

Received: 6/2/2016 5:04:35 PM
Commenter: Brad Raney
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. Please reach out with any questions.

Rappe, Gene (3451)

RECEIVED
JUN 07 2016

MILLENNIUM Bulk Terminals - Longview
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

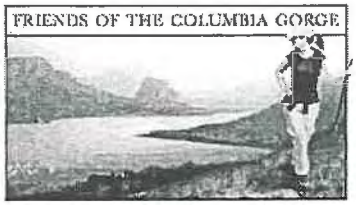
- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☐ Greenhouse Gas
- ☒ Climate Change
- ☒ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☒ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

Highly flammable fossil fuels should not be transported through the Columbia River Gorge, a Scenic Protected Area. As recent events have demonstrated, the rail industry cannot safeguard against all accidents and concurrent serious pollution of natural areas.

(comment continued)

(additional space is provided on the back)



POWER PAST COAL
communities against coal export

TALKING POINTS FOR MILLENNIUM DEIS

Topline Message: The Draft EIS reveals many serious impacts to human health and the environment that are intolerable and support rejection of the terminal. However, it dismisses other impacts without a valid basis, and this will require additional study and input. Particularly important is a thorough health impact analysis, which has been promised but is still unfinished.

The Coal Terminal Is a Bad Deal for Longview:

- Despite a chapter on the site's background, the DEIS completely ignores this project's sordid history. Its backers were caught lying to regulators and the public in 2011 when they claimed to only be interested in a 5 million-ton/year project. Why should anyone trust anything they say?
- The DEIS acknowledges that the rail system in Longview simply can't handle 16 additional mile-plus-long trains of coal per day. [S-30] Who will pay for upgrades to the rail system? What will the impacts of those upgrades be?
- Adding those trains in Longview means over two hours of additional rail gate "down time" every day in Longview [S-32] But the DEIS masks the impacts this will have to vehicles by using highly technical "level of service" framework and 24 hour averages. [5.3-30] What does it mean for an actual commuter during rush hour or parent trying to pick up their child at school?
- Noise from trains and whistles will exceed regulatory standards at hundreds of Longview homes. [S-34] Not surprisingly, the impact on people of color and low income communities is disproportionate. [S-41; 3.2-27]
- Coal dust from open piles of coal is a huge problem in other places, yet the DEIS finds the impacts to be insignificant. [S-37; ch 5.7] Coal dust coats neighbors' homes, cars and boats, and the water quality around terminals is bad. In communities that have coal piles, companies are often unreliable in their control of coal dust, and local communities have been forced to bear the cost of cleaning up the problem, monitoring coal dust, or pursuing lawsuits to hold companies accountable. The final EIS should look harder at real world examples of coal dust pollution in terminal communities.
- The DEIS does not adequately consider the economic and reputational risks to Longview and other communities impacted by coal trains and dust. Studies elsewhere have shown real estate values to decline due to increased train traffic, and businesses will not choose to relocate to "coal towns." These impacts are significant but ignored in the DEIS.

The Coal Terminal Is a Bad Deal for Washington

- Increasing rail traffic statewide would significantly exceed system capacity on almost all segments of rail in Washington. [S-30; 5.1-19] What will the economic impacts be for other users of the system, like agriculture? Who will have to bear the costs of improving the system?

Submission Number: ***MBTL-SEPA-DEIS-0000447***

Received: 5/17/2016 7:09:12 PM
Commenter: Frank Rasmussen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The Department of Ecology should speedily complete the permitting for Millennium Bulk Terminals. MBT has received a thorough and comprehensive draft EIS review one five years in the making. If we don't take the next step forward and turn this vision into a reality, it's going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward.

Submission Number: ***MBTL-SEPA-DEIS-0001754***

Received: 6/2/2016 2:26:40 PM
Commenter: Fraser Rasmussen
Organization: 350pdx
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I have followed the progression of the demand for coal export facilities in the Pacific NW over the past five years. As the reality of dramatic climate change has increased over this period I am deeply concerned the the proposal to expand the Longview Millennium Bulk Coal terminals would be disastrous for our entire region. Ciited below are my major concerns. * 16 additional mail long coal trains a day will almost certainly spell disaster for the Columbia River Gorge ecosystem. One major train derailment along the Columbia River could be catastrophic. * A vast increase in coal dust pollutants, diesel fumes, rail crossing delays, traffic congestion and noise will be intolerable to community in the path of these trains. * Rail lines on which these trains travel are currently not built to withstand the weight nor frequency with which these trains will travel without major expensive upgrades. * Most of all I oppose the expansion of the Longview coal facilities because I strongly oppose additional mining of coal to be used for export. Empirical evidence now clearly demonstrates what climate science has been predicting, increased use of fossil fuels is causing world wide climatic changes that spell disaster for all living systems. * The only means of mitigating these destructive changes is being committed to a world wide consensus of keeping at least 80% of mineable fossil fuels in the ground. * I attended the recent hearing in Longview on 5/24//16. I was moved by the concern of those supporting the Millennium project that our opposition could mean the loss of prospective jobs. Jobs are very important, but at the cost to environment created by this project is far too high. For that reason I oppose this project and vote NO in asking Gov. Inselli to reject the Millennium Bulk Terminals expansion.

Submission Number: ***MBTL-SEPA-DEIS-0001433***

Received: 5/28/2016 10:20:55 AM
Commenter: Jorgen Rasmussen
Organization: Solar Acres Farm
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments

Submission Text

For Humanity Coal Export by truck, rail and boat simply does not make sence, why transport the coal long distances when it can be burned close to where it is mined and the power, in form of electricy, can be transported much more efficent accross the grids electrical wires? Now wait, hold on, buring it in the first place is old fashion no matter where it is burned it emits toxis gasses and use lots of life suporting oxygen making way too much CO2 gas, a global warming gas, that will slowly kill us. Many activists and organizations states we need to reduce CO2 levels in the atmosphere to save the climate and our plant earth. Agian wait, hold on, the climate and our earth does not need to be saved, the earth will survive any CO2 levels no matter what we do. The climate and earth will continue to exist for millions of years in wherever form it stabilize at. The question is? will we? Will we as humans, be able to survive this? I don't think so. We are screwed, it does not matter who you are, we are all affected. We as humans need to halt the CO2 emission as soon as possible. CO2 emissions stops right here. Stop burning coal now, for sure, stop exporting Coal. It is a no win for humanity and if this keeps up we will simply all die from it, one way or another. I hereby strongly speak up AGAINST COAL Export and burning coal all together. Get involved, healty life styles, bike, drive electric, support STA public transportation, Avista's Community solar, Avista's 265 Electric Vehicle pilot charging program, get involved it will make a big diffrence. Keep Current, Go Solar, Drive Electric, Get Involved. Jorgen Rasmussen Ps Thanks for holding the hearing in Spokane May 26, due to illness in my family I was not able to attend.

Rasmussen, Jorgen (1433)

Solar Acres Farm







Rasmussen, Jørgen (1435)



Submission Number: ***TRANS-PASCO-M1-00056***

Received: 6/2/2016 12:00:00 AM
Commenter: Laura Rathbone
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Laura Rathbone (phonetic), from Richland, Washington. I am a citizen concerned about powerful corporations wanting to make a profit at the expense of the people. My concern is that powerful coal companies mislead local governments into believing our community will benefit from this export terminal.

If there is any benefit such as jobs it won't be for the people of the Tri-Cities. All we'll get is miles of noisy trains with polluting diesel and coal dust. The surfactants are not adequate, by the way. These trains roll past our schools holding up traffic and decreasing the value of my property. Who will pay for the overpass when huge traffic delays for our cities to build them? I understand it's going to be the taxpayer.

The Draft EIS predicts 19 coal train accidents per year. Who will pay for the cleanup when trains derail or other accidents? It won't be the bankrupt coal companies. The DEIS has not considered the health and economic risk for our community or for agriculture.

If farmers need an expanded export, build it for agriculture. Great. Build it for the export of food. Washington state doesn't need to transport dangerous, dirty coal. Deny the export terminal.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001321***

Received: 5/26/2016 7:01:15 PM
Commenter: John Rathbun
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing about the Millennium coal export project. I believe this project is good for the community. In regards to coal dust & human health impacts: Please refer to the American Lung Association's report on state / county rankings. First please note that the incidence of pediatric and adult asthma for Cowlitz Co is 9.1%, Clark Co. is 9.0%, and Yakima Co is 8.9%. Then compare this same statistic to communities where coal is produced or shipped through such as Campbell Co WY at 9.0%, Box Butte Co, NE (Alliance) 6.96%, Lincoln Co NE (North Platte) 6.98%, or St. Louis Co MO 7.68%. Further, the ALA ranking for 24 hr particulate matter in Campbell Co WY scores a grade of B, as compared to Clark Co WA at F and Yakima Co WA at F. The evidence is obvious, coal production and transportation is not causing a health problem, but it can act as a remedy to an economic downturn. Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☒ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☐ Greenhouse Gas
- ☒ Climate Change
- ☒ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

My name is Pat Rathmann from Moscow Idaho and I am here representing the hundreds of thousands of grandparents whose generation has caused these problems by years of burning fossil fuels, mainly coal. As a result, we have created a world our grandchildren are inheriting that is ever growing warmer, affecting not only health issues of humans but adding too the

(additional space is provided on the back)

(comment continued)

list of animal species unable to adapt and going extinct. Will our inability to say a resounding NO to fossil fuels - and YES to sustainable energy end up causing human extinction as well? More jobs are being created every year in renewable energy than are being lost in the fossil fuel energy. Grandchildren in communities across the country are bringing law suits against governments ignoring the climate change issue resulting from the continual use of fossil fuels. I hope the Commissioners of Cowlitz County and the Washington Department of Ecology will not find themselves in a court of law in an attempt to defend ~~any~~ any utterly undefensible stand encouraging the continued use of coal with all the health problems which result. Therefore, I support the "no action" alternative as the only alternative possible to protect our future generations.

Pat Rathmann
219 N. Lieuallen St
Moscow ID 83843

Submission Number: ***TRANS-SPOKANE-M2-00048***

Received: 5/26/2016 12:00:00 AM
Commenter: Patty Ratliff
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm Patty Ratliff. I'm a school teacher in Spokane, have been for more than ten years here. And I'm very, very well aware of the impact, the negative economic and health impact of a lack of jobs. Because Spokane has many families that struggle with the impact of a lack of jobs, a lack of good jobs, a lack of jobs that have dignity and meaning and that jobs that are contributing to a healthier world, a healthier Spokane community.

Children who have poor health and the health that goes with the economic challenges are at risk in the face of increasing coal trains coming through Spokane. I see that this is not a job versus no jobs issue.

Also, somebody earlier mentioned be positive. I am positive that sustainable clean energies are going to be the really truly positive way to make it into the future.

We have so many possibilities for developing clean energy, and if we focus on the terminal at Longview we're focusing in a backwards direction. We are putting our hopes, pinning our hopes on something that is really dying and death causing, unhealthful.

Also, the developing nations, China, India, many developing nations are building their ability to develop and produce clean energies and renewable energies cheaply, and they are going to be beat us to it if we keep looking back.

EVENT HOST: Thank you for wrapping up. We'll take the next speaker.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

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- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☑ Air Quality
- ☑ Human Health
- ☑ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☑ Coal Dust
- ☑ Greenhouse Gas
- ☑ Climate Change
- ☐ Plants and Animals
- ☑ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

I'm commenting because I'm concerned that the powers that be are too invested in their profits and NOT the welfare of our environment or the planet. We need to switch to non polluting forms of power now. Not next year or the year after, but now.

James A Ratz

(additional space is provided on the back)

(comment continued)

Submission Number: ***MBTL-SEPA-DEIS-0002845***

Received: 6/13/2016 2:45:37 PM
Commenter: Debbie Raub
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001541***

Received: 5/31/2016 4:57:45 PM
Commenter: Robert Rausch
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality.

Submission Number: ***MBTL-SEPA-DEIS-0001741***

Received: 6/1/2016 11:45:47 PM
Commenter: Gisela Ray
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
It is utter folly to spend precious resources for fossil fuel infrastructure when we know those fuels have to be phased out starting right now. The world needs clean power if we want to pass on a livable planet.

Submission Number: ***MBTL-SEPA-DEIS-0000180***

Received: 5/10/2016 3:11:03 PM
Commenter: Sa Re
Organization:
State: Pennsylvania

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Beyond the local fisheries, arguments against coal exports are wide-ranging - as those trains, laden with Powder River basin coal, travel through the small towns in the Pacific Northwest, the devastating impacts on local air and water quality and the health of our children are inescapable. And then there are the global CO2 consequences once the coal is burned in Asia… It's a bad idea of exporting coal, and a signal that a committed community of activists can win against big coal and climate change. And in doing that, that those committed individuals are helping to determine the makeup of our national energy policy for the future, re-establishing US innovation leadership.

Submission Number: ***MBTL-SEPA-DEIS-0000683***

Received: 5/23/2016 12:24:08 PM
Commenter: Lisa Rea
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I've been following this issue, and am glad to have the chance to weigh in. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality.

Submission Number: ***MBTL-SEPA-DEIS-0001086***

Received: 5/24/2016 7:12:48 PM
Commenter: Monica Rea
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Submission Number: ***MBTL-SEPA-DEIS-0002863***

Received: 6/13/2016 2:52:11 PM
Commenter: Dave Reagan
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well its booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of this community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0000545***

Received: 5/19/2016 5:48:17 PM
Commenter: Richard Reavey
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold’s site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON’T have Millennium fully operational. I appreciate the agencies’ hard work on reviewing this project. Please don’t let it get bogged down in an expanded scope of review. This old industrial site needs a new life. This project has undergone reviews that rival the length, rigor and expense of the Keystone XL Pipeline. Despite a process specifically designed to favor project opponents, the DEIS has made no findings that should slow the process of moving forward to issuing permits for MBT to begin construction. I urge you to do so in a timely manner.

Submission Number: ***MBTL-SEPA-DEIS-0002085***

Received: 6/7/2016 4:50:10 PM
Commenter: Richard Reavey
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. The economy depends on trade. It creates jobs working the railroads and ships, loading cargo at the ports, growing crops for export, and building the infrastructure necessary to support a trade-based economy. However, trade depends on permitting approval to construct this infrastructure. If the federal, state, or local government apply different permitting standards to projects exporting coal, they are creating a dangerous precedent that will make it hard to build new infrastructure needed to export other goods, like wheat or manufactured products. The environmental groups have a long history of challenging trade based projects in the northwest, such as Columbia river dredging, new rail facilities and/or export terminals. Governments shouldn’t threaten trade or the jobs that depend on it. This project will create additional revenue for a state that, like many others, can really use the economic boost. Through the entire construction process it will employ a significant amount of people and go a long way toward revitalizing Washington. I feel we should make this coal export terminal a reality. Thank you for considering my comments. The site at which MBT is being built is a former Superfund site. There can be no question of the proposed terminal being anything less than a vast environmental improvement over the previous site tenant. Further, it is politically motivated and arbitrary and capricious for state or federal environmental officials to ascribe any increase in global CO2 emissions form any coal exports from MBT. Coal consumption is scheduled to rise in numerous Asian markets over the next few decades. That demand will be met by Indonesian, Australian. Russian, and Chinese coal, if not by US western coal. As competitive US western coal contains substantially lower sulfur levels than coal from those markets, US displacement of coal from these markets must, by necessity, be an environmental positive. I urge state and federal officials to disregard any requests for increasing the scope of issues reviewed and further to ensure the rapid completion of permitting for the Millennium Bulk Terminals now that this exhaustive EIS has been completed and shown no significant environmental impact form this economically critical project.

Submission Number: ***MBTL-SEPA-DEIS-0000987***

Received: 5/24/2016 5:50:30 PM
Commenter: Lori Record
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! Please reach out with any questions.

Submission Number: ***MBTL-SEPA-DEIS-0001664***

Received: 5/31/2016 6:27:59 PM
Commenter: Billie Rector
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to submit my comments regarding Millennium Bulk Terminals proposed port at Longview. I fully support this project. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. This is an old industrial property being redeveloped. Keep the review to what is normal and factual.

Submission Number: ***MBTL-SEPA-DEIS-0001660***

Received: 5/31/2016 6:24:55 PM
Commenter: Justion Rector
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The Department of Ecology should speedily complete the permitting for Millennium Bulk Terminals. Right off the bat, Millennium began working with the Department of Ecology to clean up the old Reynolds smelter site. In addition Millennium is working to restore the natural habitat along the Columbia River, it has removed and replaced old pilings, and has brought the existing dock up to minimum standards. Why has this project's permits for the export terminal taken so long? All this delay has done is postpone the cleanup and restoration of a great industrial port site. We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don't hold them up any longer.

Submission Number: ***MBTL-SEPA-DEIS-0000133***

Received: 5/9/2016 12:32:31 PM
Commenter: Mark Ree
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Ree, Mark (3143)

Submission Number: ***MBTL-SEPA-DEIS-0003143***

Received: 6/13/2016 6:02:23 PM
Commenter: Mark Ree
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Thank you for the opportunity to reach out on this important issue. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it’s time to move forward. The draft EIS to evaluate Millennium Bulk Terminals proposed Longview project should be kept within reason. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with the process in a timely manner. It's the fair thing to do. Sincerely, Mark A Ree mree@fiberpipe.net 82801

Reed, Dawna (3362)

Submission Number: ***MBTL-SEPA-DEIS-0003362***

Received: 6/13/2016 10:32:45 PM
Commenter: Dawna Reed
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003364***

Received: 6/13/2016 10:49:45 PM
Commenter: Dennis Reed
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

All of the scientific data that I have read does not support global warming claims or carbon footprint data the last four billion years. The spin touted by the left and the democratic government only supports their own greed. Let's support our beloved country and do what's right. I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002865***

Received: 6/13/2016 2:53:27 PM
Commenter: Leanna Reed
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003085***

Received: 6/13/2016 5:21:52 PM
Commenter: Leanna Reed
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0001248***

Received: 5/26/2016 6:17:58 PM
Commenter: Tyler Reed
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn't have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. The opening of Millennium Bulk Terminals proposed coal export facility will have a significantly positive impact not only on the state of Washington but the entire country. So I not only urge you to keep this permitting process moving forward at an efficient pace, but to also to accept the DEIS as sufficient. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001873***

Received: 6/2/2016 6:22:18 PM
Commenter: Kyle Reeher
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State's role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Reese, Jyll (2829)

Submission Number: ***MBTL-SEPA-DEIS-0002829***

Received: 6/13/2016 2:39:28 PM
Commenter: Jyll Reese
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***TRANS-SPOKANE-M2-00075***

Received: 5/26/2016 12:00:00 AM
Commenter: Melissa Reese
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. Thank you so much for coming. Thank you everybody. Sorry I couldn't be here earlier. My name is Melissa Reese, and I was born here in Spokane. I have a bachelor's degree in business and I'm just really passionate about our planet, life. I'm here speaking for the children I hope to have, and everybody's children.

I just really think it's time to look forward. I've always been really optimistic and, you know, they say humans are resistent to change, and I think that we should be more open to that. It can be better.

And I support jobs, of course, and I just really think that -- well, I want to give you an example. I was an exchange student in high school in Germany, which I think all children should travel the world and get a good view of what's all out there. And I wanted to walk up and touch the Rhine River. I touched it. I was there.

And my host father said no, you don't touch that river. It's polluted and it's dirty and it will make you sick.

I also am a cancer survivor. I had a rare type of cancer in 1995, less than a hundred people in the world had. I lived in Idaho where my dad fought fires for the Department of Lands, fought Yellowstone. He also died of brain cancer. They said our cancers weren't linked. But nobody knows what causes cancer, it's just things we're not used to, or alternating the growth of cells in our body.

And so I try to do my best to eat the best I can, drink the best I can. I love it here, love the Northwest so much. And I'm so proud to be here and be able to speak here. And you guys have a lot of power and I hope you take that and do what you will with it.

I put my trust in you. I'm not in your position. If I were it would be an honor.

And, you know, I just want to say thank you again, and, you know, to prevent cancer and things like that we just meed to look at different ways to do things. I just want to live healthy and enjoy everything, and all the love. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002081***

Received: 6/7/2016 4:47:34 PM
Commenter: Kevin Rehbein
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold's site. They are an important part of our community and economy and will do even more great work once their permits are granted. The agencies are doing a great job of evaluating Millennium Bulk Terminals port proposal. I am convinced that this project's permit should move forward without further delay.

Reichert, Karl (0571)

Submission Number: ***MBTL-SEPA-DEIS-0000571***

Received: 5/19/2016 6:14:49 PM
Commenter: Karl Reichert
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete, it’s time for progress. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold’s site. They are an important part of our community and economy and will do even more great work once their permits are granted. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0001259***

Received: 5/26/2016 6:24:13 PM
Commenter: Michael Reid
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It's about time! The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001881***

Received: 6/2/2016 6:27:04 PM
Commenter: Philip Reid
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs and the proposed port at Longview will create much needed employment for hundreds of Americans. Please include my comments as part of the public response to Millennium Bulk Terminals plan. Too often, projects that promise historic economic opportunity like Millennium Bulk Terminal get lost in cumbersome procedures and bureaucratic delays. This is unacceptable. Our communities need to foster economic growth when it comes knocking on our door. This project has the ability to deliver this, and has earned a fair and detailed draft EIS after five long years.

Submission Number: ***MBTL-SEPA-DEIS-0000217***

Received: 5/10/2016 4:58:46 PM
Commenter: William Reigeluth
Organization:
State: Colorado

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My grandfather owned a coal company in western Pennsylvania, and my family currently owns a coal mine, also in western Pennsylvania. As a family, we have decided to keep the coal in the ground where it belongs. My grandfather passed away 10 years ago, but my mother told me a story of the disappointment he felt when looking at the awful reclamation project that covered a former coal mine of his. After my grandfather had moved his company to another mine, he was told nothing but lies and more lies about bringing the land back to what it once was. The reclamation project was a joke. This is the nature of the coal industry. I wouldn't trust Millenium and I hope everyone in Cowlitz County, WA prevents this terminal from being built. Coal is without a doubt the worst fossil fuel in the energy market. The negative impact coal has had to the environment is staggering. I suggest to anyone to watch the documentary Coal Country to get a first hand glimpse of the coal industry has had on America.

Submission Number: ***MBTL-SEPA-DEIS-0001317***

Received: 5/26/2016 6:59:14 PM
Commenter: Jacque Reilly
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Longview is a town built on natural resources and import/export. I believe this project is a perfect fit for our community. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview's quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. It is important that the public have the ability to comment on projects of this nature as the affects will last for years to come. Thank you for the opportunity to comment and please see that this project is worthy and should be allowed progress forward and develop.

Reinbold, Sheryl (3719)

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☐ Greenhouse Gas
- ☐ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

It is my Prayer that soon you find an answer to this Coal Problem.
I will Keep it Prayer for now
Let's Believe God together
for a Miracle. He can happen.

Sheryl Reinbold

(additional space is provided on the back)

(comment continued)

RECEIVED
MAY 27 2016

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- [x] Noise
- [ ] Air Quality
- [ ] Human Health
- [ ] Rail Transportation
- [ ] Vessel Transportation
- [ ] Vehicle Transportation
- [ ] Coal Dust
- [x] Greenhouse Gas
- [x] Climate Change
- [x] Plants and Animals
- [x] Marine Species, Fish, or Fisheries
- [ ] Wetlands or Streams
- [ ] Water Quality
- [ ] EIS Regulatory Process
- [ ] Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

Tayvyn Reise – 16
I live less than a mile from the tracks. It affects the plants, wildlife, and wetlands near my home. Not to mention the noise emmited from there all day.

(additional space is provided on the back)

(comment continued)

Remley, Jeff (0870)

Submission Number: ***MBTL-SEPA-DEIS-0000870***

Received: 5/24/2016 4:37:52 PM
Commenter: Jeff Remley
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. Raising a family is tough, and this economy is not making it any easier. That’s why we need to capitalize on any opportunity that we have to provide good-paying jobs that can support a family. The Millennium Bulk Terminal project will create jobs that can help families give their children the head-start that they need. There are men and women throughout the state that are waiting for the chance to work hard for their families. It simply makes no sense to turn them away at this point. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0000260***

Received: 5/10/2016 6:15:15 PM
Commenter: John Remmers
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly support the project and the thousands of jobs this project will create. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

My name is Dr. Diana Rempe. I am a psychologist and I live in North Portland, Oregon.

As I looked through the draft EIS, I came upon chart 6.1 that asks if there are adverse effects expected from allowing this project to proceed. To twenty-two out of twenty-three of the questions, the answer is yes. Which begs the question, why are we continuing with this process at all? The reason I hear again and again is that it will create jobs.

I want to speak to one aspect of these potential jobs—the health risks to workers. In 1969, the Coal Mine Health and Safety Act was created to protect the health of miners. Despite apparent advances, in 2012 researchers at the National Institute for Occupational Safety and Health discovered an almost 10-fold increase in coal workers' pneumoconiosis—or black lung disease. And, of particular importance to this project, the finding led to the CDC looking closely at surface mine workers—an understudied group. Here too, evidence was found of serious, occupation-related respiratory illness in many of the workers.

What this really speaks to is that coal work remains an occupation with great health risks. These risks are exacerbated by the fact that workers who will be exposed to the most coal dust will also be the people who are regularly exposed to highest levels of diesel particulates and other air toxins. In the case of particulate matter, the health risks correlate with exposure and there is no level of exposure at which adverse health risks are not seen.

This draft EIS does not have enough data in it to convince me that this would be safe work, when there is substantial evidence to the contrary. It most certainly does not follow the precautionary principle—by first insuring the protection of workers' health.

We need a comprehensive health impact assessment. Truly, given the undeniable threat to worker health, we should take the No-Action alternative. We need to move beyond these sorts of projects—and

focus instead on creating living wage jobs that are healthy for workers and the greater community.

David J. Blackley, Cara N. Halldin, and A. Scott Laney "Resurgence of a Debilitating and Entirely Preventable Respiratory Disease among Working Coal Miners", American Journal of Respiratory and Critical Care Medicine, Vol. 190, No. 6 (2014), pp. 708-709.
doi: 10.1164/rccm.201407-1286LE

Pneumoconiosis and Advanced Occupational Lung Disease Among Surface Coal Miners — 16 States, 2010–2011. (2012, June 15). Retrieved May 23, 2016, from https://www.cdc.gov/mmwr/preview/mmwrhtml/mm6123a2.htm

Submission Number: ***MBTL-SEPA-DEIS-0001163***

Received: 5/25/2016 2:52:19 PM
Commenter: Carl Renfro
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am unable to attend any of the scheduled commentary events, but would, none the less, like to register my concerns. Although substantial research on environmental concerns and possible mitigation has been completed for Washington state (especially Cowlitz county), the proposed rail routing actually involves six states; clearly, further studies are needed. As a resident of Idaho my areas of concern include: *enhanced global climate change due to increased coal burning in China (wouldn't the money be better spent in developing sustainable/environmentally friendly alternatives?) *aquatic/water quality (not only for the Columbia river, but for other areas where trains will pass over a large body of fresh water such as Lake Pend Oreille in the Sandpoint area) *rail transportation concerns, which include inadequate infrastructure for increased traffic, substantially increased health impacts from coal dust and emergency vehicle delays, and noise pollution due to increased train whistles in populated areas. I also urge you to consider the fact that although the six states involved will share (to some degree) the environmental and safety risks, neither Idaho nor Oregon stands to gain any economic benefit. In other words, the residents of both Oregon and Idaho would be required to assume substantial environmental risk, as well as, possible additional safety expenditures with no compensatory financial gain. I cannot support this proposal and strongly encourage that it be fully refused. Sincerely, Carl T. Renfro

Submission Number: ***MBTL-SEPA-DEIS-0001797***

Received: 6/2/2016 5:13:12 PM
Commenter: Rory Renk
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough now it is time to move forward with a fair process for permitting. We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don't hold them up any longer.

Submission Number: ***MBTL-SEPA-DEIS-0000043***

Received: 5/2/2016 9:56:57 PM
Commenter: Agnes Renner
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

How is this shipment of coal going to help to preserve the earth? I would hope that Washington state would opt out of this move.

Submission Number: ***MBTL-SEPA-DEIS-0002921***

Received: 6/13/2016 3:13:40 PM
Commenter: Linda Rennick
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0000814***

Received: 5/24/2016 2:32:41 AM
Commenter: Greg Renstrom
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Unfortunately, coal has a reputation to be a dirty and non friendly way to produce energy. This is false. The idea of clean coal has been around for some time now and the coal companies have made great efforts and achievements working towards improving the way coal is mined, shipped, and used to provide good quality and cost effective energy to the world. I would recommend that many of the folks that feel coal is a bad way to produce energy come out to the powder river basin and see how clean and efficient it is. Coal companies have strived to improve and have done just that. Coal companies continually work towards improving efficiencies and continuing to mine clean coal unlike some people think that coal is plain dirty and have not made advancements. Many companies have been awarded environmental awards for reclamation and often when visitors come to mine sites they will actually think that virgin ground has been mined and that reclamation areas have not been touched. I am in strong favor that folks that feel coal is not the best option for clean energy visit a coal mine and see how their operations work and speak with the people of the companies. Coal mining is not just a job, it is a career for many people. Families and communities rely on coal. Schools, small businesses, restaurants, etc, depend of coal not only for electricity but to also flourish. The royalties and taxes from coal mining help build schools, roads, and infrastructure. Coal is clean, provides cost effective energy, and provides communities with great benefits. Providing coal exports will allow communities and Americans to be successful and assist in setting America up to be successful.

Submission Number: ***MBTL-SEPA-DEIS-0001892***

Received: 6/3/2016 9:08:00 AM
Commenter: Richard Reuther
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I wanted to send follow-up comments regarding the coal terminal in addition to the comments I made to the court reporter in Pasco June 2, 2016. The coal terminal isn't the answer; it isn't even the question. It isn't a matter of how many coal trains driving through town is acceptable or how often to spray the coal to keep the dust down. It's a matter of how we can get off coal and other fossil fuels and move to renewable sources of energy. Rather than investing $26M (thanks to the local paper for the timely propaganda plug) on new track through town, the railroads should be branching out into other businesses (in much the same way RJ Reynolds and B&W did when tobacco was deemed to be the cause of lung cancer) to augment their role as the nation's preferred freight hauler. Let them cover their tracks with solar panels to provide electricity for electric locomotives (they already run on electricity generated by diesel engines) and sell the excess to the general power grid. What good will it do to mine and transport the last ton of coal from Wyoming if the end result is the melting of the ice caps? If you are concerned about jobs, set up the solar cell manufacture in Wyoming to replace the mining jobs. Don't hang out the false hope that coal trains will create jobs along the route. Time and time again, that argument is proven false in the long run; the jobs rarely appear. We need to think 10, 20, 50 years out, not just about next quarter's stock dividend. Literally, this is the planet we are talking about. We should not sacrifice it to corporate "needs."

Submission Number: ***TRANS-PASCO-Q1-00001***

Received: 7/14/2016 9:55:50 AM
Commenter: Richard Reuther
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Richard Reuther, R-E-U-T-H-E-R. I'm a resident of Pasco. I think that we're discussing the wrong question. Coal is dying. Dragging coal out of the mountains and dragging it through every metropolitan statistical area of Washington and Oregon is not the point.

The point is that we need to be looking for alternative energy sources, instead of spending $26 million putting in a new rail line through Pasco, the railroad would have been better spending money to find energy sources like solar perhaps that could power electric trains.

If we're creating jobs by dragging coal around and then the polarized caps melt and all those people 50 feet and below are washed out, what have we gained, when we could have done something different. When we could have done something smarter.

COAL -- an industry that no longer benefits but harms us. May 23, 2016

It is not rational or fair to increase the damage to our Gorge communities by increasing the number of coal trains passing through. I live in Stevenson, Washington, in the heart of the scenic Columbia River Gorge, which attracts many visitors. Tourism is now the basis of our economy The train tracks cut through the town, and there are already too many trains coming through. To increase the number of coal trains would have many adverse effects here: coal dust pollution, which has adverse health effects noise, inaccessibility between sections of the town, including delays in emergency services when needed, a negative impact on tourism, and more. Increasing the number of coal trains traversing through the Gorge would damage an area of rare natural beauty that needs to be preserved, as well as the quality of life of local residents. The only benefit would be more profit for the coal companies – at our expense. That is not a fair or moral or ethical outcome. The cost to the Gorge communities is too high. It already costs.us

Coal (and all fossil fuels) now needs to stay in the ground, and more pressure placed on developing green energy sources providing many jobs, which would offset loss of jobs in the coal industry – which must now be phased out.

There is no need to build coal export terminals. We need to focus on reducing carbon emissions into our atmosphere and work hard toward mitigating climate change which is already evidencing adverse effects for all (hotter summers, more and larger forest fires, glacier melt, ocean warming and rise in sea level, etc.)

Coal is no longer a good option for meeting our energy needs. Our communities must not be sacrificed for coal industry profits. Our communities and the health of the environment are a higher value. No action alternative is best choice

Mara C Reynolds

P O Box 62

Stevenson ,WA 98648

maracr@embarqmail.com

ticket #377164

Submission Number: ***MBTL-SEPA-DEIS-0001680***

Received: 5/31/2016 6:40:14 PM
Commenter: Scott Reynolds
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete it's time for progress. MBT has received a thorough and comprehensive draft EIS review one five years in the making. If we don't take the next step forward and turn this vision into a reality, it's going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done!

Submission Number: ***MBTL-SEPA-DEIS-0000735***

Received: 5/23/2016 1:43:35 PM
Commenter: Tiffanie Reynolds
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to submit my comments regarding Millennium Bulk Terminals proposed port at Longview. I fully support this project. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Submission Number: ***MBTL-SEPA-DEIS-0001327***

Received: 5/26/2016 7:03:03 PM
Commenter: Cynthia Rhea
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs and the proposed port at Longview will create much needed employment for hundreds of Americans. Please include my comments as part of the public response to Millennium Bulk Terminals plan. Current world markets and decision in East Asia re capital allocation over the last decade demonstrate that American coal exports are not necessary to, nor causally-related to, decisions in China, Korea or Japan to build coal-fueled power generation capacity. The environmental impacts will occur regardless of Cowlitz County and Ecology decisions to grant permits for construction of the project-specific docks and terminals in question. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0000208***

Received: 5/10/2016 4:47:22 PM
Commenter: Jesse Rice
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State's role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. I'll look forward to updates.

Submission Number: ***MBTL-SEPA-DEIS-0000320***

Received: 5/11/2016 1:51:21 AM
Commenter: SHELBY RICE
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and wan to underscore my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing market, thereby spurring greater investments at home. Washington has long depended on trade and exports as vital part of our economy, directly and indirectly creating nearly 40 percent of all of our stat's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0000024***

Received: 4/30/2016 10:23:13 PM
Commenter: Robert Rich
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to reach out on this important issue. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it's time to move forward. Thank you for letting me submit my opinions and show my support for the project. Thanks.

Submission Number: ***TRANS-PASCO-M1-00011***

Received: 6/2/2016 12:00:00 AM
Commenter: Ken Richard
Organization: Clean Tech Alliance of Washington
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. My name is Ken Richard (phonetic). I reside in Seattle. I'm also a member of Clean Tech Alliance of Washington. The basic premise of the coal usage in the DEIS is the low sulfur coal from the Powder River Basin as we export it to Japan. This demand for increase from these countries is growing. After having lost 30 percent of its energy capacity in the 2011 tsunami event, Japan wants to build 46 new coal plants. And Korea will be building ten new plants in the next ten years. But more importantly, these two countries also intend to take responsibility for carbon reduction as both countries are significant supporters of the climate agreement. Coal-fired plants have the highest efficiency and are cleaner than Asia cleaner which is 24 times better than the plants in the U.S. and 33 percent better than plants in China.

Furthermore the project creates an opportunity for the Pacific Northwest lab to market clean technologies further reducing future carbon reduction. Therefore, this project can meet our state's regulatory framework and should be permitted for our important trading partners can benefit from the stable (inaudible) underground coal while implementing their serious carbon reduction technologies.

The project is a win-win situation, in my opinion. The project at under utilized clean technologies developed right here in the Tri-Cities area to be marketed in Asia along with coal. It also improves the rail structure to move more product for export. All the while implementing extending partnership with two countries who are committed to serious carbon reduction.

Thank you for the opportunity.

RECEIVED
JUN 09 2016

6/7/2016

At the time of the Harbin disaster the Ministry of Health of China associated three million annual deaths with the use of coal.

Helena is bisected by a railroad. Sending killer coal through our community must not occur;

Keep fossil fuels in the ground.

Belle C Richards

Belle C. Richards, MD, FAAP
801 Linden
Helena, Montana
59601

Submission Number: ***TRANS-LV-M2-00114***

Received: 5/24/2016 12:00:00 AM
Commenter: Phyllis Richardson
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Phyllis Richardson (phonetic), and I'm from Portland, Oregon, a concerned citizen from Portland. I think it was said earlier I'm not from somewhere else. I share the planet with all of you and everyone here in Cowlitz County. This planet is on its way to becoming inhospitable and maybe uninhabitable.

We have been told that in order to avoid total climate collapse, we must keep 80 percent of the fossil fuels that are in the ground now in the ground. Why are we even thinking about expanding fossil fuel use? What happens here affects everyone -- everyone on the planet including people in Portland.

You've heard about the possible health and safety concerns about the oil trains all along the Columbia Gorge and here in Longview. And maybe the terminal will be built right, but the bigger question is why are we adding to climate change?

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000222***

Received: 5/10/2016 5:04:01 PM
Commenter: Willis Richardson
Organization:
State: Utah

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Forget sending coal. It will never be a clean source of energy and is reminiscent of a century ago. I certainly feel badly for coal miners but like a lot of industries its day is done. The miners should be paid unemployment benefits and retained for other careers. The idea of take us back to the way it was is not viable today, yesterday or the future. It is an emotional statement based on fear. It is just like religious leaders claiming Jesus is coming, not going to happen. Vote no on any suggestion of shipping coal It is a bad idea for everyone. It is simply a delaying tactic to make changes. It pitiful our country is so full of politicians who make a fools promise.

Submission Number: ***MBTL-SEPA-DEIS-0000450***

Received: 5/17/2016 7:12:09 PM
Commenter: Chuck Richter
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to reach out on this important issue. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. Thank you for accepting comments for this important project. Please make the necessary steps to move forward on its approval as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0002355***

Received: 6/9/2016 5:38:09 PM
Commenter: Marc Richter
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0002015***

Received: 6/6/2016 3:00:25 PM
Commenter: R.Max Richter
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly support the project and the thousands of jobs this project will create. GHG from the use of coal and nationwide rail capacity should not have been included in this study, but now that they've been included and thoroughly studied, it's time to move this proposal forward! Millennium Bulk Terminals EIS should be thorough but held to the same standards as any other port proposal. We need to do everything we can to strengthen and grow the economy of Washington and the west in general. The project proposed will do just that. Thank you.

Submission Number: ***TRANS-LV-M1-00062***

Received: 5/24/2016 12:00:00 AM
Commenter: Rick
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Hello. My name is Rick (inaudible.) I live in Cowlitz County. In fact I moved here in 1958. Graduated high school in Castle Rock. In '64 I went to work at Longview Fiber Company. And in that year they employed roughly 1600 union members. And our corresponding company, which was Weyerhaeuser, in their woods and in their pulp facility and in their mill had over 5,000. So total we he roughly 7,000 workers generating family wage jobs and benefits. If you look at the two facilities now, look at Longview Fiber, which is KapStone now, is down to about 800. Look at all of Weyerhaeuser, including their timber, which they use, roughly again is about 800. So you've got about 1600 jobs still in this community where they were close to 7,000 on industrial good paying family jobs. If we look at our county today, there are nearly 40 percent, or just above that, that live in poverty. We have tremendous amount of problems. And if we look at the things we use in producing our paper, the chemicals are way more dangerous and have possible repercussions than coal dust, but yet we're using it. If we stop bringing companies into Cowlitz County because we have a fear, we're going to have a greater extent of poverty. So we all need to work together, we all need to do what's right, and Millennium is doing that. They're doing every environmental think that is put before them. So I recommend that we continue this effort, allow them to continue. It's been over four years, millions of dollars spent already and nothing accomplished because of what we need to go through. So encourage everyone here to think about what we need in Cowlitz County. Not people coming from other counties. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003394***

Received: 6/14/2016 12:53:25 AM
Commenter: Dennis Ricker
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I've been following this issue, and am glad to have the chance to weigh in. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible. Sincerely, Dennis Ricker
Dwricker@yahoo.com 82633

Submission Number: ***TRANS-SPOKANE-M2-00008***

Received: 5/26/2016 12:00:00 AM
Commenter: Sarah Rickman
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. My name is Sarah Rickman, and I support Millennium because it would create 26,000 jobs, direct or indirect jobs during construction, and 300 more direct or indirect jobs during operations.

At a time when we have a massive amount of more people out there looking for jobs than we actually have jobs, the unemployment is high. And the real unemployment is even far more beyond that.

Someone brought up the coal dust. There would be no unavoidable or significant adverse environmental impacts from coal dust. When you think of a family just trying to make ends meet, trying to get out there, find a job, any job, to put food on the table, what's more important, a very limited probability if at all of somehow polluting the environment or being able to feed that family. I would choose the family.

We live in an economy right now where people seem to think environment is more important than human life. Despite what the government wants us to believe, there is no proof that humans are the reason for this so-called climate change. Please consider this for the jobs for those families that are just trying to put food on the table. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000044***

Received: 5/2/2016 10:22:00 PM
Commenter: Sharon Rickman
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The proposed Millennium terminal project with its plans to export up to 60 million tons of strip-mined coal per year from the Powder River Basin through a port in Longview, Washington has significant, unavoidable impacts–from greenhouse gas emissions to detrimental health impacts to communities along the river. This terminal would become the largest coal terminal in North America exporting tons of coal each year to Asia and should not be built. The Dept. of Ecology acknowledges that moving over up to 60 million tons of coal in uncovered trains and stockpiling it along the Columbia would harm people's health and the river. The trains carrying coal would pollute our air, water, and communities. Coal dust can contain toxic pollution, including arsenic and polyaromatic hydrocarbons. Coal dust poses a public health issue ror farmers, landowners, and communities along the rail lines. Burlington Northern Santa Fe (BNSF) acknowledges that coal trains spill a lot of dust. BNSF's studies show that 500 pounds of coal can be lost in the form of dust from each rail car. Each 100-car train, therefore, may spill 50,000 pounds of coal dust into our rivers and towns. Coal dust blowing from the coal terminal will foul the air and water, as well as homes, boats, and businesses up to several miles away. What are your plans to mitigate the greenhouse gas emissions and health problems resulting from a proposed terminal that is equivalent to five coal-fired power plants? I urge you to ensure the EIS looks at the cumulative health, safety, and environmental impacts to communities along the rail-line and close to the strip mines. As you know, Oregon's Department of State Lands (DSL) denied the permit for the Coyote Island Terminal at the Port of Morrow in Boardman in 2014. In reviewing the application and supporting materials, the DSL decided that the proposed project was not consistent with the protection, conservation and best use of the state's water resources, and that the applicant did not provide sufficient analysis of alternatives that would avoid construction of a new dock and impacts on tribal fisheries. The proposed Millennium coal terminal would result in our community getting dirty coal train traffic – threatening our health, safety, environment, and economy,– without any benefit. Please do not let multinational corporations threaten our community's livelihood just so they can profit. This impact statement makes the decision clear – the Millennium coal project should be rejected – as it already has been by communities across the Northwest. Thank you for your consideration, Sharon Rikcman

Submission Number: ***MBTL-SEPA-DEIS-0000858***

Received: 5/24/2016 1:09:39 PM
Commenter: Kenneth Riedl
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The Obama Administration has done all they can to ruin coal, and thus the infrastructure of the state of Wyoming. We need this port for our coal so our state can stay strong and stay employed by opening shipping lanes to those countries that would like to still use clean, affordable coal energy.

Submission Number: ***MBTL-SEPA-DEIS-0000092***

Received: 5/5/2016 9:31:20 PM
Commenter: Paul Rieger
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. MBT has received a thorough and comprehensive draft EIS reviewâ€"one five years in the making. If we don’t take the next step forward and turn this vision into a reality, it’s going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. Thanks for considering my comments. Sincerely, Paul M. Rieger

Submission Number: ***MBTL-SEPA-DEIS-0002123***

Received: 6/7/2016 5:17:25 PM
Commenter: Paul Rieger
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

This is a great use of an old industrial site. We need more companies willing to clean up and utilize brownfield sites. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview’s quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. Now's the time to utilize trade infrastructure. The Millennium Bulk Terminals project is one step closer to being able to participate in this vital business. Thanks to the agencies for considering my comments.

Submission Number: ***MBTL-SEPA-DEIS-0001470***

Received: 5/30/2016 11:53:08 PM
Commenter: Lisa Riener
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am against the proposed coal terminal for Longview, Wa. I am against this proposal for various reasons. Please see, below, the studies that need to be conducted regarding this proposal. The Millennium Bulk Terminal, if built, would be the largest coal terminal in North America, with plans to export 44 million tons of coal annually. Wherever that coal is burned, it will spew tons of Co2 into the air, a greenhouse gas that will remain in the atmosphere for centuries. Despite the warnings of climate scientists, carbon dioxide emissions are still rising. This coal terminal will impact the rise of CO2 emissions. In Washington State, ocean acidification from CO2 emissions, is threatening our shellfish industry and threatens the survival of salmon and the other fish on which our economy and much of the world depends. A study done in 2012 for the World Bank by the Potsdam Institute for Climate Impact Research and Climate Analytics concluded that if we reach 4 degree Celsius warming by the end of the century, we will have extreme heat-waves, declining global food stocks, loss of ecosystems and biodiversity, and life-threatening sea level rise. I am requesting that you do a comprehensive study of the amount of Co2 which burning 44 million tons of coal will add each year to the greenhouse gases already in the atmosphere. Also we must study the cumulative amount of Co2 which will be added to get this coal transported to these locations, listed in the SEPA. I know that this study is difficult. But it must be done. Another study that must be done has to do with the coal trains themselves. The dust generated by the coal trains will impact cities for 300 miles, at least. This will effect the air quality of these cities. This will effect the health of people in these cities. We cannot allow this awful dust to destroy the health of people in these cities. Thank you, Lisa Riener

Submission Number: ***MBTL-SEPA-DEIS-0002842***

Received: 6/13/2016 2:43:52 PM
Commenter: John Riggs
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Sirs: This comment refers to shipping. I am a retired US Merchant Marine officer, graduate of the US Merchant Marine Academy. My Concern is the number of coal carriers proposed to enter and depart the Columbia River. The Columbia R bar is notorious, and the probability of a grounding does increase with the proposed number of sailings. This comment is not meant to question the pilots, who are in fact members of my own union, and are highly respected professionals. Again, it is the shear number that concerns me. A bulk carrier in ballast approaching the coast may be more at risk than a loaded ship departing. The inbound vessel will have discharged her ballast in preparation for loading, and will not handle or maneuver very well, being literally bow high, with maximum hull area exposed to wind. This type of ship is not built for speed, and is generally relatively low powered, which can add to the difficulty maneuvering. They are generally not the highest paying jobs, and therefore are usually crewed with less skilled mariners, flying what are called "flags of convenience", a questionable but common cost cutting strategy. I point out the case of the MV New Carissa which was only 10 years old and was lost off Coos Bay in Feb 1999, causing significant environmental damage. The skipper made a poor decision to save money and anchor there, (so as not to burn fuel motoring back and forth off the coast.) The weather wasn't even all that bad, really, compared to what we are used to on this coast. They could not maneuver the ship. As you know, the ballast had to be pumped out offshore, not at the dock, in order to prevent introduction of invasive species. (A ship could "change out it's ballast, one tank at a time, pumping out at sea the Asian ballast water, and replace it with clean ocean water, which could then be pumped out at the dock, but that does not guarantee some hardy specimen can't land here. However, it costs money, and requires some skilled labor (again, money), and if conditions are too rough, the job might not be effective.) There are international treaties dealing with ballast water management. Coal is a low income commodity, and as such, will always induce ship managers to cut costs. Consider the cost/benefit analysis (for us.) As Profits are pinched, there will be more incentive to cut operating costs even further, which makes no sense for our environment.

Submission Number: ***MBTL-SEPA-DEIS-0003229***

Received: 6/13/2016 7:01:16 PM
Commenter: John Riggs
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Sirs: This comment is related to coal dust accumulation in rail beds, and the related railbed de-stabilization which follows. Railroad derailments have been making headline news both in the US and Canada in recent years, sometimes with devastating results. Most recently is the oil train incident at Mosier,OR, in the Columbia R Gorge. Acknowledging that there are numerous possible causes for derailments, we ought to note that coal trains and oil trains are using the same tracks. If the accumulation of coal dust really is a problem leading to railbed instability, then we ought to weigh the possible consequences of exploding tank cars, in addition to all the other health risks of coal dust. So, "if the accumulation of coal dust really is a problem leading to railbed instability....." I wish to refer you to an article in the NYT, Jan 25, 2010, under Energy and Environment. (I do not know how to forward the entire article) The takeaway was not that coal dust was a problem, but that utilities and railroad companies were in court over who had to pay for the repairs to the railbeds. Everyone seemed to agree that the dust was a significant problem, but who should pay. Indeed. Who should pay? The oil train referred to in Mosier was reportedly not traveling fast, yet it "jumped" the tracks, resulting in a towering inferno. We were lucky in Mosier. What if.....? BNSF, one of the plaintiffs in the above mentioned law suits, has required shippers to load coal to minimize dust blowing from the cars. To their credit, BNSF has opened a much publicized "re-spray" facility in Pasco, WA, claiming that now they have "it" under control. Having already bet so much on coal, BNSF (and railroads in general) have been forced to "do something", which includes also their massive PR effort. Perhaps the railbed issues are also related to the length/ weight of these trains. Maybe the dust is just coincidental. But who will pay?

Submission Number: ***MBTL-SEPA-DEIS-0003328***

Received: 6/13/2016 8:47:11 PM
Commenter: John Riggs
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Sirs: This comment is in regard to my concern for coal dust around the proposed Millenium terminal, (or anywhere else) I am a retired merchant marine officer, having graduated USMMA, and spent my entire life in the maritime industry. I have worked on bulk carriers, though not coal carriers specifically, and I have called at ports around the world that exported coal. The coal dust has always been a fact of life. In my researching coal export here in the Northwest, I have spoken to several people who actually lived in the vicinity of coal terminals. One was an elder lady who said her family house in Hampton Roads (Norfolk) VA, was never clean. She said that the dust is not imaginary--that it is not something "greenies" have made up. Another person worked in Richards Bay, (South Africa) and reported that the entire ecosystem has changed, that mangroves have died, due to coating the leaves with coal dust. Living here in Bellingham, WA, I was interested in seeing for myself the effects of dust near the Westshore Coal Terminal, in British Columbia. I drove around Pt Roberts residential area, and spoke to a gentleman who showed me coal dust on his garden plants. Pt Roberts is Southeast (approximately) from the Westshore terminal. That is actually upwind from the terminal, considering the prevailing winds. I also drove around the farm land to the north and northeast, and saw evidence there as well. The applicants say that they can control the dust. My experience, however, having worked bulk ships, is that the hatches are open to the sky during the loading. Coal is loaded very quickly, and the air displaced by the coal must exit those hatches, carrying coal dust with it. Moving coal around produces dust, whether in the staging/storage area, or in the actual loading of the ships, and not even mentioning the trains here. BNSF has touted its "re-spraying" operation in Pasco. In the loading operation, however, that does not help. We face the specter of very gradual environmental degradation, leading one to wonder who is the beneficiary of the cost/benefit analysis, and who pays the cost.

Submission Number: ***MBTL-SEPA-DEIS-0001316***

Received: 5/26/2016 6:59:05 PM
Commenter: Mike Riley
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! I appreciate you considering this feedback.

Submission Number: ***MBTL-SEPA-DEIS-0001690***

Received: 5/31/2016 6:50:43 PM
Commenter: Pat Riley
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. This project is exactly the kind of economic boost that the state really needs. The benefits are numerous. The terminal would create jobs, generate significant new tax revenue, and help attract businesses to our area. In many ways, it can be a source of continued growth for years to come. It is tough to believe that a project with an obvious upside like this has been held up for so long. Those in charge should view this project for its benefits to the community and see it through to the finish. Our citizens are counting on it. Thanks again to the agencies for allowing public comment on this important proposal. It should continue to go forward with much enthusiasm.

Submission Number: ***MBTL-SEPA-DEIS-0002650***

Received: 6/13/2016 12:18:08 PM
Commenter: Robert Riley
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002206***

Received: 6/7/2016 7:19:56 PM
Commenter: David Rinaldi
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Please commit to a timetable for the issuance of a final EIS. Ecology’s SEPA Rules require a final EIS to be issued, as close as possible

Submission Number: ***MBTL-SEPA-DEIS-0002458***

Received: 6/10/2016 2:09:07 PM
Commenter: Julie Rinard
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0002056***

Received: 6/7/2016 4:23:13 PM
Commenter: David Rinta
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough, now it is time to move forward with a fair process for permitting. Thank you for letting me submit my opinions and show my support for the project.

Submission Number: ***MBTL-SEPA-DEIS-0002039***

Received: 6/6/2016 3:21:53 PM
Commenter: Jaime Rinta
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. Current world markets and decision in East Asia re capital allocation over the last decade demonstrate that American coal exports are not necessary to, nor causally-related to, decisions in China, Korea or Japan to build coal-fueled power generation capacity. The environmental impacts will occur regardless of Cowlitz County and Ecology decisions to grant permits for construction of the project-specific docks and terminals in question. Thank you for your consideration. I look forward to seeing this project come to reality.

Comment on the Draft Environmental Impact Statement
For the Millenium Bulk Terminals — Longview

by Michael Riordan, Ph.D.

This document is my official comment on the SEPA Draft Environmental Impact Statement for the Millennium Bulk Terminals — Longview (MBTL) project, which was released for public comment on April 29, 2016. During the past four years, I have been submitting scoping and other comments on this and other proposed coal-terminal projects in the Pacific Northwest, namely the Gateway Pacific Terminal at Cherry Point, WA, and the Coyote Island project near Boardman, OR. In all three projects, I have focused on the fugitive coal-dust releases at the terminals, especially into the adjacent waters, and have developed considerable expertise in this area. For an example of this work, please consult my analysis of coal-dust losses into Salish Sea waters near Cherry Point from the planned Gateway Pacific Terminal (GPT).[1] I will restrict my comments herein to similar aspects of the MBTL SEPA Draft Environmental Impact Statement (DEIS), particularly those presented in Section 5.7: Coal Dust.

To summarize, the MBTL DEIS severely underestimates the amount of fugitive coal-dust losses into the surrounding environments, both on land in Longview and into the adjacent Columbia River. The principal reasons for these underestimates include the use of unwarranted, optimistic input parameters in the AP-42 fugitive dust calculations (specified by the Environmental Protection Agency), and the application of unjustified and unreasonably high efficiency factors for dust-control measures (such as watering) proposed to be used at the terminal. In general, I find that the figures for fugitive-dust emission rates presented in the DEIS to be low by factors of 2 to 7. This means that the values provided in Table 5.7-2. Coal Dust Total Suspended Particulates Emissions Rates at Maximum Throughput (DEIS p. 5.7-5) should be multiplied by factors of 2 to 7 to be truly representative of emissions that would occur at the proposed MBTL facility.

The assumption of a 95 percent fugitive-dust reduction efficiency two paragraphs below that table is unwarranted. This figure was imported from a previous analysis of the

[1] Michael Riordan, "Estimating Fugitive Coal Dust at the Proposed Gateway Pacific Terminal," Eastsound, WA: Research Now Working Paper No. 16-1, January 26, 2016, available online at *http://www.research-now.org/wp-content/uploads/2016/01/FugitiveDustAtGPT.pdf*

proposed Boardman project and has no basis in actual experience. Moreover, the Coyote Island terminal proposed for that site was a completely enclosed coal-storage-and-transfer system — unlike MBTL, which is proposed to employ open coal-storage piles. Adequate justification is not given for the 95 percent figure used in the MBTL DEIS. If one instead applied an equally reasonable 90 percent in this calculation, given the limited justification for the other figure, the estimated fugitive coal-dust losses from the corresponding part of the transfer system would double. If the 95 percent efficiency factor is to be used in this calculation, it requires much better justification than has been provided in the DEIS.

I could not find specific details of the AP-42 calculations, including important parameters such as average local wind speeds at the terminal and coal moisture and silt content, in the DEIS proper. In the SEPA Coal Technical Report (listed as document No. ICF 00264.13, April 2016), I did find a Table 2 on p. 12 that is identical to Table 5.7-2 mentioned above, below the statement:

> The potential for coal dust emission from the coal export terminal and impacts on the area surrounding the coal terminal were estimated using AERMOD Version 14134. . . . AERMOD estimates the deposition of particulates (such as coal dust) using information on the particulates' emission rate and particle sizes.[2]

On the very next page, this document states that procedures from EPA AP-42, Sections 13.2.4 and 13.2.5 were used to estimate emissions rates, and that further details on the air-quality modeling could be found in a 2015 report prepared by the URS Corporation.[3] The needed details of the AP-42 calculations, which are crucial inputs to the AERMOD simulations of coal-dust dispersal, were finally found in Appendices C through G of this report — which was not on the MBTL web site (as it should have been), and I obtained only after great difficulty from one of the three co-lead agencies. Numbers presented in Appendix C: Summary of Emissions of this report correspond exactly to those given in Table 5.7-2 of the DEIS and Table 2 of the SEPA Coal Quality Technical Report, so it is safe to conclude that these appendices represent the calculations of the coal-dust emission rates used in the AERMOD simulations extensively quoted in the DEIS. It was surprising — and somewhat disturbing — that this information is not publicly available on the web.

[2] Millennium Bulk Terminals—Longview, SEPA Coal Technical Report, April 2016, p. 12.

[3] Millennium Coal Export Terminal, Longview, Washington, Environmental Report, Air Quality (URS Corporation 2015).

Appendix C states at the outset that the maximum throughput for this project will be 49 million tons of coal per year, based on 8 trains per day each consisting of 125 rail cars containing 100 tons per car unloading coal 355 days a year. But these figures yield only 100,000 tons per day or 35.5 million tons per year, well short of the projected annual total. Something is seriously amiss with these figures, probably the coal tonnage per car, for if one were instead to use 125 tons/car, the total annual throughput comes in close to 49 million tons per year. This obvious error may however have been propagated through the calculations of fugitive dust emanating from the trains bringing coal to the terminal.

Appendix E uses a simplified approximation to obtain the fugitive coal dust from wind erosion of the storage piles, similar to the approach used in my report, "Estimating Fugitive Coal Dust at the Gateway Pacific Terminal."[4] A crucial input parameter in this approximation is the silt content of the coal, which the URS Corporation report cites as 2.2 percent, based on the mean value given in AP-42, Section 13.2.4, Table 13.2.4-1 for the coal used in "coal-fired power plants (as received)." But this value is not appropriate because that category of dust sources includes coal from many different mines within the US and shipped to electrical utilities located mainly east of the Mississippi. That sample necessarily includes lots of eastern bituminous coal, while the coal to be transported to the Longview terminal would all be western subbituminous coal from the Powder River Basin in Montana and Wyoming. The latter is generally much dustier and becomes even more so because it also dries out during open rail-car transport for more than 1,000 miles through one of the most arid regions of the country.[5] A more suitable number for the coal silt content to be inserted in this approximation is the mean value 6.2 percent for "western surface coal mining" in the same Table 13.2.4-1. And it could be dustier. AP-42 Section 11.9: Western Surface Coal Mining gives a mean value 8.6 percent in Table 11.9.3 for the silt content of western coal, based on a range of measured values from 6.0 to 11.3 percent — much greater than the 2.2 percent used by URS Corporation in its estimates.

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[4] Riordan (2016), p. 8. This approach is based on C. Cowherd, G. E. Muleski, and J. S. Kinsey, "Control of Open Fugitive Dust Sources: Final Report," Midwest Research Institute Report No. EPA-450/3-88-008, Kansas City, MO, September 1988. See especially section 4.0: Storage Piles, pp. 4-1 to 4-24, and eqn. 4-9, p. 4-17. The URS Corporation report cites the Western Regional Air Partnership Fugitive Dust Handbook, Section 9.3, as the source of this approximation, which is derived from the EPA report.

[5] See, for example, Roderick J. Hossfeld and Rod Hatt, "PRB Coal Degradation — Causes and Cures." Available online at *http://krtcommodities.com/files/PRB%20PRB%20COAL%20DEGRADATION.pdf.*

Replacing 2.2 percent by 6.2 percent in the equation, and applying the same 90 percent efficiency factor for wetting down the coal storage piles, one obtains total annual emissions from storage-pile erosion that are *nearly three times as large* as those in DEIS Table 5.7-2, or total suspended particulates (TSP) of 3.05 tons/year rather than 1.08.[6] (In the same vein, the PM10 emissions should come in at 2.59 tons/year rather than 0.92, and the PM2.5 emissions at 0.40 tons per year rather than 0.19.) And given such an extreme uncertainty in the silt content used in these very rough estimates, the uncertainties in the estimated particulate emissions rates should be taken as the difference between the two calculations — 1.97 tons/yr for TSP (and 1.67 and 0.21 tons/yr for PM10 and PM2.5.)

A much better approach to estimating these fugitive dust emissions would be to have made *actual measurements* of the silt content of the PRB coal being exported from the Westshore Terminals in Delta, British Columbia. These exports have been occurring throughout the period of the URS Corporation study and are continuing today. Given the major uncertainties in the estimated emissions due to the uncertainty in the silt content, it seems mandatory for the terminal proposers to make such measurements and then repeat these calculations (and AERMOD dust-dispersion modeling) using more accurate values obtained from such measurements of PRB coal similar to that to be exported by MBTL.

Appendix F addresses another major source of fugitive coal-dust emissions at MBTL, those that occur when coal is added to or extracted from the storage piles by the huge "stacker/reclaimer" mechanisms. According to AP-42 Section 13.2.4: Aggregate Handling and Storage Piles, the quantity of dust emissions is proportional to the average annual local wind speed U to the 1.3 power, or $U^{1.3}$, and inversely proportional to the coal moisture content M to the 1.4 power, or $M^{1.4}$. This part of the calculation appears to have been done properly, using appropriate values for U = 5.04 mph and M = 4.5 percent. But the report authors then apply two multiplicative efficiency factors to correct the emissions for wetting of the coal by sprayers and foggers: the same 90 percent efficiency factor as applied to the coal storage piles, and another factor of (1 - 175/365) = 0.52 derived from AP-42 Section 13.2.2: Unpaved Roads. The first correction factor is extremely dubious

[6] But note that wetting down coal storage piles is not a very effective strategy for reducing dust emissions, especially when they are being frequently altered as in this case. As the EPA's AP-42 Section 13.2.4 states on p. 13.2.4-5, "Watering of the storage piles themselves has only a very temporary slight effect on total emissions. Thus the 90 percent efficiency factor applied in this calculation is likely to be excessive.

and the second completely inadmissible because it duplicates the effect of the first factor, and it applies to suppressing dust from *unpaved roads* — which is very different from the dust caused by falling coal. That is double counting. But taken together, as done in the URS Corporation calculations, they result in an excessive 95 percent reduction in the estimated emissions rate due to these coal-handling processes. Instead of 50.4 tons/per year TSP, for example, they obtain only 2.62 tons/year, the exact figure that appears in line 2 of DEIS Table 5.7-2, "Coal pile development and removal."

A much better way to estimate these emissions would be to use an appropriately higher value of the moisture content M in the AP-42 calculations to reflect the moisture added to the coal being transferred to and from the storage piles. If the moisture content were to be doubled to 9.0 percent, for example, the quantity of fugitive dust emissions generated in the materials-handling processes would decrease by 62.1 percent from 50.4 to 19.1 tons per year.[7] Or if M were to be tripled to 13.5 percent, the emissions would fall by 78.5 percent to 10.8 tons per year. But under no circumstances can anyone reasonably obtain an emissions rate reduction of 95 percent in these materials-handling processes by wetting the coal being handled, because coal dries out rapidly after wetting. The approach used by URS Corporation is *wrong*, pure and simple, leading to estimated values of coal particulate emissions rate that is too low by a factor of 4 to 7. Unfortunately, these errors are then propagated throughout the AERMOD dust-dispersion calculations to achieve results completely at odds with reality.

Appendix F also attempts to estimate the fugitive coal-dust emission rate from all other materials-handling operations, including the loading of the coal onto bulk carriers at the MBTL piers, and it reports a total TSP figure of 1.05 tons per year. This is exactly 20 percent, or one fifth of the 5.25 tons/year entered in Table 5.7-2, which leads me to think that a more conservative efficiency factor was used to obtain the latter result. Indeed, if one were to substitute an overall dust-containment efficiency factor of 95 percent for the 99 percent used for this calculation (i.e., one multiples the uncorrected emissions by 0.05 rather than 0.01), one obtains the necessary factor of 5 increase. That must be what was

[7] The appropriate domain of definition for these AP-42 calculations ranges up to a moisture content M of 4.8 percent. At higher levels, the accuracy of the calculations deteriorates and the uncertainty of the results increases. See EPA AP-42 Section 13.2.4: Aggregate Handling and Storage Piles, table on p. 13.2.4-4.

meant by the statement given on DEIS p. 5.7-5, "The modeling was completed for the deposition of coal particles and a more conservative assumption about the effectiveness of full enclosures and spray/fogging for conveyors. A 95% reduction was assumed for the enclosed conveyors and spray/fogging systems. . . ."[8] But a closer examination of these calculations reveals that an additional multiplicative factor of 0.52 has been applied to the uncorrected emissions, as it was to materials handling at the storage piles, based on AP-42 Section 13.2.2: Unpaved Roads. As before, this additional factor is duplicative and inadmissible. Thus the entry in Table 5.7-2, line 3, for "Ship transfer and conveyors," must be divided by 0.52 to remove the effects of this factor, resulting in a more credible value of 10.1 tons/year for these materials-handling emissions, not 5.25 tons/yr.

This approach is however inappropriate for calculations of emissions at the rail-car unloading facility and during loading of the bulk carriers at the piers, which are very different operations from those that occur inside the enclosed coal conveyors to and from the storage piles. During ship loading, for example, it is more appropriate to use equation (1) in AP-42 Section 13.2.4 (as was done for the storage-pile operations in Appendix F), which is the approach used to estimate to estimate such fugitive coal-dust emissions in the Coyote Island and Gateway Pacific Terminal projects.[9] Doing so, one readily obtains uncontrolled emissions during ship loading of 25.2 tons/year. Of course, some reduction of these emissions will occur due to the fact that ship-loading chutes would extend down into the carrier holds during loading, especially when the loading begins and the holds are largely empty. But winds blowing over the holds, which all have to remain open during the loading process, pulls out much of the dust drifting within them due to the Bernoulli effect. And coal is accidentally dropped onto the deck as a chute moves between holds; this coal is directly exposed to these winds.[10] Thus it is unreasonable to expect any better than a 50 percent reduction, which results in fugitive dust emissions during ship loading of 12.6 tons/year — much greater than the 5.25 tons/year given in DEIS Table 5.7-2 for the entire chain of materials-handling processes but comparable to the 10.1 tons/yr above.

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[8] The exact same statement appears in the SEPA Coal Technical Report, p. 13.

[9] ENVIRON International Corporation, "Gateway Pacific Terminal Air Quality Technical Report, Revised Site Layout," June 16, 2014, *http://eisgatewaypacificwa.gov/sites/default/files/content/files/AQ-GPT_RevisedLayout_AQ_Report_061614.pdf/*.

[10] See, for example, Riordan (2016), p. 13.

Appendix G attempts to estimate rates of fugitive dust emissions from coal trains approaching the MBTL site and waiting in line to be unloaded at the facility. This is a subject area beyond my specific expertise that would be better examined by experts like University of Washington Professor Dan Jaffe, who has researched this question in great detail.[11] But a brief examination of these calculations reveals that they are based on the same rough approximation URS Corp. used in Appendix E to estimate fugitive emissions from wind erosion of coal storage piles. This is an *exceedingly crude approximation* that is likely to be rife with major errors and large uncertainties, because this approach was intended to be used for storage piles, not trains. For example, URS Corporation again employs the same low value 2.2 percent for the coal silt content and provides no logical basis for it. Highly appropriate measurements of the silt content on the surface of trains carrying PRB coal passing near Longview after traversing the Columba Gorge *could* easily have been made, but they were not. Instead these estimates rely on a conveniently low value taken from AP-42 Table 13.2.4-1 for coal from mines throughout the United States. And such measurements *could* have evaluated the impact of topper agents called "surfactants" that are supposedly being administered by BNSF Railways to suppress the coal-dust emissions in transit. In addition, these calculations do not attempt to evaluate the percentage of time that the vector sum of the wind speed and train motion, called the "effective wind speed," exceeds the 12 mph threshold value for dust emission to occur — a necessary component of this approximation procedure.[12] The authors evaluate only the percentage of time annually (8.78%) that the ambient wind speed exceeds 12 mph, but that is not sufficient for this purpose. In the summer, for example, winds above 6.7 mph blow from the ENE about 26 percent of the time, in roughly the opposite direction from trains approaching and entering the MBTL site.[13] The effective wind speed at the coal surface will easily exceed the 12 mph threshold if the trains are traveling at only 10 mph.

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[11] See, for example, Daniel Jaffe *et al.*, "Diesel particulate matter and coal dust from trains in the Columbia River Gorge, Washington State, USA," *Atmospheric Pollution Research* **6** (2015), pp. 946-952, available at *http://www.atmos.washington.edu/jaffegroup/modules/APOLLO/Jaffe_DPM_coal_dust_trains_ColumbiaRivGorge_2015.pdf*

[12] Cowherd et al. (1988), pp. 4-16 to 4-18. This dependence of fugitive emissions on the vector sum of the wind velocity and train velocity was also examined in Jaffe et al (2105). See especially Figure 4 on p. 951.

[13] Millennium Coal Export Terminal, Longview, Washington, Environmental Report, Air Quality Analysis Appendix L – Air Quality Modeling Analysis, URS Corporation, October 2014, revised January 2015. Figure 6: Wind Rose for the Mint Farm Station – Summer, p. 23.

For these and other reasons, the extremely rough approximation presented in Appendix G is completely inadequate in attempting to establish the total fugitive dust emissions from coal trains entering the MBTL site and awaiting unloading. This estimate needs to be repeated using a much better (computer) model of these emissions and more accurate values for crucial input parameters like the coal silt content and effective wind speeds over the loaded rail cars. For the purposes of further analysis, I will thus use a figure of 2.73 tons/year from this emission source, or three times the value quoted in DEIS Table 5.7-2, with an uncertainty of 1.82 tons/year — or two times that figure.

In conclusion, the values for fugitive coal-dust emission rates given in the MBTL SEPA Draft Environmental Impact Statement are based on unwarranted assumptions and optimistic input parameters for which little or no logical basis has been presented, either in this document or the supporting report by URS Corporation. The authors of that report appear to have cherry-picked data from the Environmental Protection Agency's AP-42 documents and applied these values inappropriately, in some cases using extremely high efficiency factors that are not and cannot be justified. They assume nearly perfect coal-terminal operations and allow no margin for human error. In an attempt to rectify these unwarranted assumptions and input parameters, I have come up with the following table to replace Table 5.7-2: Coal Dust Total Suspended Particulates at Maximum Throughput:

Operation	**Annual Average TSP Emission Rate, in tons/year**	
Coal pile wind erosion	3.05 – 5.02	(1.08)
Coal pile development and removal	10.8 – 19.1	(2.62)
Ship transfer and conveyors	10.1 – 12.6	(5.25)
From trains during unloading	2.73 – 4.55	(0.91)
Total	**26.7 – 46.3**	**(9.86)**

The individual rates presented in this table range from 1.9 to 7.3 times the values given in DEIS Table 5.7-2 (shown above in parenthesis), indicating how inaccurate those values in fact are, and the total of the four contributions falls between 2.7 to 4.7 times as high. In addition, the DEIS includes no estimate whatsoever for the fugitive-dust emissions that would occur during the process of unloading the rail cars and injecting the unloaded coal into the material stream entering terminal operations. This is a flagrant omission.

The fugitive coal-dust emissions rates for PM10 and PM2.5 particulates given in report Appendices C through G (but not presented in DEIS Table 5.7-2 or anywhere else that I could find in the DEIS) are low by similar factors as presented above. Since these rates are crucial input parameters to the AERMOD simulations of dust dispersal around the MBTL site, the results of these simulations will be correspondingly low by similar factors. This is especially significant because these lighter dust particles will remain aloft much longer and travel much farther than the larger, heavier particles included in TSP values. As this subject area is beyond my specific expertise, however, I can offer mostly general comments about this problem. More analytical work needs to be done to correct this glaring deficiency before issuing the final MBTL Environmental Impact Statement.

Much of the coal-dust emissions will occur at and around the coal-storage piles. As shown in the first two lines of my table above, the contributions of total suspended particulates TSP amount to between 13.8 and 24.1 tons/year in all — 40 to 144 percent higher than the *entire* 9.89 tons/year given in DEIS Table 5.7-2. Similar increases are to be expected in the PM10 and PM2.5 particulates to be entered in AERMOD simulations. And since strong winds occur from the southeast, according to wind roses in Fig. 4-8 of URS Corporation report's Appendix L, plumes of fugitive coal dust will occasionally be blown into the residential areas northeast of the MBTL facility.[14] This adverse impact is partially reflected in DEIS Figure 5.7-4 (on p. 5.7-19), but it will be substantially more severe. And the environmental impacts here will increase significantly once the fugitive dust released in unloading the coal trains is adequately treated and included in the mix.

The coal-dust emissions during ship loading at the piers will largely fall into the adjacent Columbia River and drift downstream with the current. Such an impact seems to be included in DEIS Figure 5,7-4, with a plume centered near the end of the pier. But it will be much greater and more significant due to the fact that the coal-dust losses from ship loading appear to be grossly underestimated in the URS Corporation report. As I estimated on p. 6 of this comment, the total annual emissions during ship loading could easily be as large as 12.6 tons/year — almost all of it ending up in the water. This dust dispersal must be simulated using AERMOD, as must its downstream drift and settling.

[14] Millennium Coal Export Terminal, Longview, Washington, Appendix L (2014/2015), pp. 21-25.

In the final analysis, much more and better analytical work needs to be done on the fugitive coal-dust emissions before they can be taken as truly representative of what will occur at the Millennium Bulk Terminals, Longview. What currently appears in the SEPA Draft Environmental Impact Statement and in the supporting URS Corporation report are gross underestimates, by factors of 2 to 7, of the various fugitive-emissions rates. These low values have been propagated through the AERMOD simulations and result in similar gross underestimates of the inhalable PM10 and PM2.5 particulates that will affect areas around the proposed terminal and the citizens living or working in those areas. The final SEPA Environmental Impact Statement for this project should include a thorough, objective assessment of these emissions. But achieving that goal will likely require that this work be done by another company, given URS Corporation's highly questionable performance on the draft EIS. The final draft of this work should then be peer-reviewed before publication by recognized experts such as UW Professor Jaffe.

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APPENDIX A
CONSTRUCTION EMISSIONS

SUMMARY

Source	Construction Emissions (tpy) [Maximum per Year]								
	NO_x	CO	VOC	SO_2	TSP	PM_{10}	$PM_{2.5}$	HAPS	CO2e
COMBUSTION SOURCES									
Equipment Onsite	24.9	8.15	2.09	0.99	2.23	1.83	1.83	0.04	5,263
Barges	20.4	5.41	0.52	0.01	0.44	0.37	0.37	0.03	1,053
Total Combustion Sources	45.3	13.6	2.61	1.00	2.67	2.20	2.20	0.07	6,316
FUGITIVE SOURCES									
Controlled Fugitive Earthwork	-	-	-	-	1.00	0.49	0.10	-	-
Total Fugitive Sources	-	-	-	-	1.00	0.49	0.10	-	-
Total - All Construction Sources	45.3	13.6	2.61	1.00	3.67	2.68	2.30	0.07	6,316

INPUT DATA:

Major Construction Activities and Typical Equipment Fleets

Construction Equipment Type	Rail Infrastructure and Rotary Car Dump Station		Conveyors, Transfer Stations and Surge Bins		Shiploader, Dock, and Trestles	
	Max Qty per Month	Duration (months)	Max Qty per Month	Duration (months)	Max Qty per Month	Duration (months)
Mobile Cranes (25-50t)[1]	0	18	2	18	2	18
Mobile Cranes (50-100t)[1]	0	18	2	18	2	18
Mobile Cranes (100-300t)[1]	0	18	2	18	2	18
Water Trucks[2]	1	18	1	18	1	18
Dump Trucks[2]	1	18	1	18	1	18
Dozers	1	18	1	18	1	18
Excavators[3]	1	18	1	18	1	18
Rollers	2	18	2	18	1	18
Graders	2	18	0	0	1	18
Compactors	1	18	1	18	1	18
Track Laying Machine	1	1	1	1	0	0
Drill Rigs	1	1	1	1	0	0
Impact Piling Rigs	1	1	1	1	2	4
Loaders[4]	1	18	1	18	1	18
Rover Barge	0	0	0	0	2	18
Generator	1	18	1	18	2	18
Air Compressor	1	18	1	18	2	18

Source: MBTL, *Noise Resource Report* , Appendix D-1 (URS, June 2014)
NOTES:
[1] Mobile cranes to be shared between the 3 areas.
[2] Water truck to be shared between the 2 land areas.
[3] Excavators to be shared between the 3 areas.
[4] Loaders to be shared between the 3 areas.

Typical construction fleet may be modified with equivalent items as construction activities demand

Assume entire construction period for all 3 areas is: 18 months total
5 days/week

ONSITE EQUIPMENT (NON-BARGE) EMISSIONS:

Equipment Type	Engine Size (hp)	Fuel	Maximum Units Onsite (per year)	EPA NONROAD SCC Number	EPA NONROAD model combustion emission factor (tons/yr per unit)					
					THC-Exhaust	CO-Exhaust	NOx-Exhaust	SO2-Exhaust	SO2-Exhaust	PM-Exhaust
Crane, 50 ton	160	Diesel	2	2270002060	5.15E-02	1.65E-01	8.59E-01	135.49	2.28E-02	5.04E-02
Crane, 150 ton	260	Diesel	2	2270002045	7.48E-02	2.12E-01	8.68E-01	201.76	3.88E-02	6.33E-02
Crane, 300 ton	460	Diesel	2	2270002040	6.20E-02	3.09E-01	1.44E+00	216.37	4.26E-02	7.47E-02
Water Trucks	350	Diesel	1	2270002051	2.06E-02	9.01E-02	3.13E-01	108.922	1.86E-02	3.49E-02
Dump Trucks	350	Diesel	4	See Notes	2.06E-02	9.01E-02	3.13E-01	108.922	1.86E-02	3.49E-02
Dozers	185	Diesel	0.4	2270002069	1.66E-01	8.15E-01	1.96E+00	437.06	8.46E-02	2.35E-01
Excavators	230	Diesel	2	2270002036	3.16E-01	1.24E+00	3.65E+00	977.46	1.79E-01	9.63E-01
Rollers	260	Diesel	2.8	2270002015	4.26E-02	1.76E-01	5.19E-01	110.57	2.12E-02	4.42E-02
Graders	185	Diesel	0.8	2270002066	1.66E-01	8.15E-01	1.96E+00	437.06	8.46E-02	2.35E-01
Compactors	75	Diesel	1.8	2270002060	1.47E-01	7.15E-01	5.75E-01	175.95	3.61E-02	1.79E-01
Track Laying Machine	See Notes	Diesel	0.2	See Notes	3.17E-01	1.25E+00	4.61E+00	460.07	9.09E-02	2.49E-01
Drill Rigs	NONROAD Default	Diesel	1.2	2270002033	4.12E-02	1.48E-01	5.47E-01	62.90	1.27E-02	3.29E-02
Impact Piling Rigs	NONROAD Default	Diesel	3	2270002033	4.12E-02	1.48E-01	5.47E-01	62.90	1.27E-02	3.29E-02
Loaders	130	Diesel	1	2270002060	1.98E-01	9.29E-01	2.05E+00	454.68	9.05E-02	2.51E-01
Generator	99	Diesel	2	2270006005	1.16E-01	4.26E-01	1.00E+00	113.66	2.48E-02	5.85E-02
Air Compressor	75	Diesel	5	2270006010	2.27E-04	1.17E-03	2.23E-03	0.29	6.30E-05	1.77E-04

NOTES:
Assume Dump Truck size/emissions same as Water Truck.
Assume Track Laying Machine uses 1 diesel locomotive and 1 front end loader engine (Hanoco Rail, New Track Construction). Assume full-time locomotive used 4 hr/day, 5 days/wk.
Horsepower and weight estimates based on capacity ratings and industry specifications, or average ratings per equipment type. Where hp could not be assumed, an average hp rate in NONROAD for the equipment type was used.

Emission Rates for Onsite Equipment (tpy)

	NO_x	CO	VOC	SO_2	TSP	PM_{10}	$PM_{2.5}$	HAPS	CO2	CH4	N2O	CO2e
Crane, 50 ton	1.30	0.33	0.10	0.05	0.10	0.08	0.08	0.002	241	0.0118	0.0006	241
Crane, 150 ton	2.00	0.42	0.15	0.09	0.13	0.10	0.10	0.002	463	0.0189	0.0010	464
Crane, 300 ton	1.44	0.37	0.08	0.04	0.07	0.06	0.06	0.002	215	0.0106	0.0005	216
Water Trucks	0.31	0.09	0.03	0.02	0.03	0.03	0.03	0.000	109	0.0053	0.0003	109
Dump Trucks	1.25	0.36	0.12	0.07	0.14	0.11	0.11	0.002	436	0.0214	0.0011	437
Dozers	0.92	0.34	0.07	0.04	0.10	0.08	0.08	0.002	182	0.0089	0.0004	182
Excavators	7.30	2.48	0.63	0.36	0.72	0.60	0.60	0.012	1955	0.0960	0.0047	1958
Rollers	1.95	0.64	0.16	0.08	0.17	0.14	0.14	0.003	415	0.0204	0.0010	416
Graders	1.13	0.47	0.10	0.05	0.14	0.11	0.11	0.002	298	0.0126	0.0006	254
Compactors	0.68	0.27	0.10	0.02	0.06	0.05	0.05	0.001	77	0.0038	0.0002	77
Track Laying Machine	0.75	0.21	0.05	0.02	0.06	0.05	0.05	0.001	77	0.0038	0.0002	77
Drill Rigs	0.64	0.17	0.05	0.01	0.04	0.03	0.03	0.001	73	0.0036	0.0002	74
Impact Piling Rigs	1.64	0.44	0.12	0.04	0.10	0.08	0.08	0.002	189	0.0093	0.0005	189
Loaders	2.35	0.93	0.20	0.09	0.25	0.21	0.21	0.005	459	0.0226	0.0011	460
Generator	2.01	0.88	0.22	0.05	0.18	0.14	0.14	0.004	240	0.0118	0.0006	240
Air Compressor	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.000	2	0.0001	0.0000	3
Total Onsite Construction Equipment (tpy)	24.9	8.1	2.09	0.99	2.23	1.83	1.83	0.04	5252	0.26	0.01	5263

Note:
For PM_{10}, $PM_{2.5}$, HAPs, and GHGs (CH_4 and N_2O), use same emission ratio as emission factor ratios for Large Diesel Engines (below): P_{10} and $PM_{2.5}$ ratio to TSP; HAPs ratio to CO, and; GHGs ratio to CI_2.

BARGE EMISSIONS:

Barges for Construction	2	(Maximum # Units per year!)
Engine Size (propulsion)	3000 hp	
Total Barge Engines	7000 hp	
Barge Positioning Time	1 hr/ship (in-out)	(Conservative estimate)
Total Power per "Trip"	7,000 hp-hrs	
Construction Trips:	1 per day	
	260 per year	
Annual Power	1,820,000 hp-hrs/yr	
Annual Diesel Fuel Use	12,740 MMBtu/yr	
	92,248 gallons/yr	

Emission Factors for Barges

	lb/MMBtu, fuel input											
	NO_x	CO	VOC	SO_2	TSP	PM_{10}	$PM_{2.5}$	HAPS	CO2	CH4	N2O	CO2e
Large Diesel Engines	2.30	0.85	0.08	0.002	0.07	0.06	0.06	0.004	165	0.0081	0.0004	165

Source:

Emission factors from *EPA AP-42, Section 3.4 Large Stationary Diesel and All Stationary Duel-fuel Engines* (10/96). Assume Sulfur content of 0.0015% by weight (15 ppm). Assume TSP to PM10 ratio from Table 3.4-2, and PM2.5=PM10. Sum of HAPs factors from Table 3.4-3 and 3.4-4.
Global Warming Potentials (GWPs):
CO_2 - 1
CH_4 - 25
N_2O - 298

Emission Rates for Barges (tpy)

	NO_x	CO	VOC	SO_2	TSP	PM_{10}	$PM_{2.5}$	HAPS	CO2	CH4	N2O	CO2e
Construction - Barges	20.4	5.41	0.52	0.01	0.44	0.37	0.37	0.03	1051	0.05	0.003	1053

FUGITIVE DUST EMISSIONS:

Methodology based on EPA AP-42 Chapter 13.2.3 Heavy Construction Operations

Assumed acreage for groundwork 100 acres
Assumed schedule for groundwork 1.5 year
18 months

Annual Groundwork Operations 8.33 acres/month

AP-42 Emission Factor 1.2 tons PM/acre/month

Uncontrolled PM Emissions: 10.0 tons

Controlled Emissions (assume watering only; no factor included for natural control from precipitation):
Control %: 90 *WRAP Fugitive Dust Handbook, Table 9-4, Watering.*

PM_{10} and $PM_{2.5}$ Fractions of Total PM

(CARB Appendix A CEIDARS $PM_{2.5}$ and PM_{10} fractions of TSP; Fugitive Dust - Construction and Demolition
(http://www.agmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-(pm)-2.5-significance-thresholds-and-calculation-methodology/appendix-a-updated-ceidars-table-with-pm2-5-fractions.doc?sfvrsn=2)

PM_{10} Fraction of Total PM 0.489
$PM_{2.5}$ Fraction of Total PM 0.102

Emission Rates for Fugitive Dust (tpy)

	NO_x	CO	VOC	SO_2	TSP	PM_{10}	$PM_{2.5}$	HAPS	CO2	CH4	N2O	CO2e
Construction - Fugitive Dust	-	-	-	-	1.00	0.49	0.10	-	-	-	-	-

APPENDIX B
CONSTRUCTION - 'NONROAD' MODEL EMISSIONS

EPA`s NONROAD Emissions Model
Core Model ver 2008a, 07/06/09
Jul 25 11:58:30: 2014
MBTL
2014
Options file used: C:\NONROAD\Projects\MBTL.OPT
Total for year: 2014
Tons/Year

Cnty	Sub	SCC	HP	Population	THC-Exhaust	CO-Exhaust	NOx-Exhaust
####		#########	40	1.70E-03	1.53E-05	5.51E-04	4.18E-05
####		#########	75	6.63E-02	1.04E-03	3.81E-02	2.83E-03
####		#########	100	3.06E-02	8.13E-04	2.98E-02	2.22E-03
####		#########	175	1.19E-01	3.66E-03	1.34E-01	9.98E-03
####		#########	300	1.70E-03	1.14E-04	4.20E-03	3.12E-04
####		#########	40	3.32E-02	5.20E-05	1.84E-03	2.95E-04
####		#########	50	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####		#########	75	2.23E-01	3.06E-03	8.60E-02	1.35E-02
####		#########	100	1.33E-03	2.21E-05	6.22E-04	9.74E-05
####		#########	175	2.65E-02	6.26E-04	1.76E-02	2.76E-03
####		#########	6	3.82E+00	2.92E-03	1.94E-02	2.14E-02
####		#########	11	1.71E+00	2.26E-03	1.50E-02	1.66E-02
####		#########	16	1.04E+00	1.87E-03	8.73E-03	1.63E-02
####		#########	25	9.57E-02	2.47E-04	1.15E-03	2.15E-03
####		#########	6	4.11E-01	6.24E-04	5.13E-03	4.78E-03
####		#########	11	7.72E-01	1.87E-03	1.54E-02	1.43E-02
####		#########	16	9.24E-01	2.79E-03	1.51E-02	2.76E-02
####		#########	25	1.66E+00	7.28E-03	3.95E-02	7.19E-02
####		#########	40	2.37E+00	8.94E-03	4.83E-02	1.58E-01
####		#########	50	2.19E+00	1.17E-02	6.31E-02	2.06E-01
####		#########	75	2.22E+00	1.88E-02	1.78E-01	2.48E-01
####		#########	100	6.07E+00	7.16E-02	7.40E-01	8.22E-01
####		#########	175	5.63E+00	8.40E-02	3.99E-01	1.01E+00
####		#########	300	1.92E+00	4.20E-02	1.70E-01	5.19E-01
####		#########	600	5.70E-01	2.34E-02	1.59E-01	3.93E-01
####		#########	11	1.78E-02	2.15E-05	1.41E-04	1.57E-04
####		#########	16	2.73E-02	4.94E-05	2.28E-04	4.24E-04
####		#########	25	6.15E-02	1.80E-04	8.32E-04	1.54E-03
####		#########	40	1.05E+00	2.69E-03	1.22E-02	3.37E-02
####		#########	50	1.07E+00	3.91E-03	1.78E-02	4.89E-02
####		#########	75	1.73E+00	1.23E-02	6.46E-02	1.23E-01
####		#########	100	1.76E+00	1.71E-02	8.67E-02	1.63E-01
####		#########	175	2.58E+00	2.85E-02	1.07E-01	3.64E-01
####		#########	300	2.25E+00	4.12E-02	1.48E-01	5.47E-01
####		#########	600	1.29E+00	4.05E-02	1.88E-01	6.15E-01
####		#########	750	3.03E-01	1.42E-02	7.74E-02	2.22E-01
####		#########	1000	1.65E-01	1.39E-02	5.50E-02	1.93E-01

####	#########	1200	2.73E-03	2.78E-04	1.10E-03	3.85E-03
####	#########	2000	5.47E-03	7.93E-04	3.14E-03	1.10E-02
####	#########	6	2.05E-02	4.89E-05	3.97E-04	3.77E-04
####	#########	11	1.13E-01	3.59E-04	2.91E-03	2.77E-03
####	#########	16	2.34E-01	9.77E-04	5.20E-03	9.73E-03
####	#########	25	1.04E+00	7.14E-03	3.80E-02	7.11E-02
####	#########	40	2.16E+00	1.08E-02	5.30E-02	2.00E-01
####	#########	50	1.15E+00	8.01E-03	3.92E-02	1.47E-01
####	#########	75	8.92E-01	8.53E-03	8.81E-02	1.30E-01
####	#########	100	4.03E+00	5.70E-02	6.74E-01	7.03E-01
####	#########	175	1.50E+01	2.76E-01	1.39E+00	3.22E+00
####	#########	300	1.10E+01	3.15E-01	1.24E+00	3.65E+00
####	#########	600	2.91E+00	1.39E-01	8.58E-01	2.18E+00
####	#########	750	9.29E-02	7.56E-03	7.04E-02	1.22E-01
####	#########	1000	1.08E-01	1.83E-02	9.27E-02	2.72E-01
####	#########	1200	4.10E-03	9.42E-04	4.78E-03	1.40E-02
####	#########	2000	4.10E-02	1.39E-02	7.04E-02	2.07E-01
####	#########	3000	1.37E-03	6.15E-04	3.12E-03	9.16E-03
####	#########	25	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####	#########	40	1.72E-01	7.55E-04	3.82E-03	1.33E-02
####	#########	50	2.73E-03	1.27E-05	6.42E-05	2.24E-04
####	#########	75	9.16E-02	7.91E-04	5.87E-03	1.07E-02
####	#########	100	8.85E-01	1.04E-02	7.08E-02	1.24E-01
####	#########	175	3.33E+00	5.15E-02	1.65E-01	6.50E-01
####	#########	300	3.41E+00	7.69E-02	2.12E-01	9.99E-01
####	#########	600	2.10E+00	8.22E-02	3.69E-01	1.44E+00
####	#########	750	9.02E-02	5.44E-03	3.35E-02	1.01E-01
####	#########	1000	2.60E-02	3.56E-03	1.27E-02	5.47E-02
####	#########	1200	1.37E-03	2.27E-04	8.08E-04	3.49E-03
####	#########	40	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####	#########	50	5.47E-03	3.69E-05	1.88E-04	6.67E-04
####	#########	75	3.96E-02	3.54E-04	3.56E-03	5.14E-03
####	#########	100	3.03E-01	3.80E-03	4.30E-02	4.59E-02
####	#########	175	3.10E+00	5.49E-02	2.71E-01	6.48E-01
####	#########	300	5.19E+00	1.36E-01	5.51E-01	1.62E+00
####	#########	600	5.93E-01	2.19E-02	1.40E-01	3.57E-01
####	#########	750	3.55E-02	2.78E-03	2.63E-02	4.68E-02
####	#########	175	8.20E-03	2.28E-04	1.04E-03	2.45E-03
####	#########	300	7.79E-01	3.06E-02	9.01E-02	3.12E-01
####	#########	600	1.65E+00	1.13E-01	5.80E-01	1.45E+00
####	#########	750	9.35E-01	1.04E-01	8.34E-01	1.35E+00
####	#########	1000	4.54E-01	1.03E-01	5.26E-01	1.41E+00
####	#########	1200	1.43E-01	4.34E-02	2.21E-01	5.93E-01
####	#########	2000	7.27E-01	3.41E-01	1.73E+00	4.66E+00
####	#########	3000	1.78E-01	1.13E-01	5.75E-01	1.54E+00
####	#########	16	5.47E-03	1.44E-05	7.92E-05	1.42E-04
####	#########	25	6.15E-02	2.70E-04	1.48E-03	2.65E-03
####	#########	40	1.42E+00	4.98E-03	2.78E-02	8.61E-02
####	#########	50	1.58E+00	7.50E-03	4.18E-02	1.29E-01

####	#########	75	3.14E+00	2.62E-02	2.34E-01	3.24E-01
####	#########	100	1.80E+01	2.08E-01	2.01E+00	2.28E+00
####	#########	175	9.23E+00	1.23E-01	5.82E-01	1.49E+00
####	#########	300	4.78E-01	1.04E-02	4.25E-02	1.30E-01
####	#########	600	6.30E-01	2.12E-02	1.47E-01	3.40E-01
####	#########	11	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####	#########	16	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####	#########	25	1.37E-02	6.97E-05	3.78E-04	6.88E-04
####	#########	40	7.20E-01	2.88E-03	1.56E-02	5.08E-02
####	#########	50	8.27E-01	4.37E-03	2.36E-02	7.72E-02
####	#########	75	1.17E+00	1.01E-02	9.51E-02	1.33E-01
####	#########	100	5.02E+00	5.98E-02	6.18E-01	6.86E-01
####	#########	175	1.27E+01	1.96E-01	9.29E-01	2.35E+00
####	#########	300	1.21E+01	2.81E-01	1.14E+00	3.47E+00
####	#########	600	8.90E+00	3.63E-01	2.47E+00	6.14E+00
####	#########	750	6.72E-01	4.28E-02	4.07E-01	7.67E-01
####	#########	1000	3.28E-01	4.54E-02	2.40E-01	6.64E-01
####	#########	1200	6.83E-02	1.18E-02	6.25E-02	1.73E-01
####	#########	2000	4.02E-01	1.20E-01	6.34E-01	1.75E+00
####	#########	3000	1.50E-02	5.38E-03	2.85E-02	7.88E-02
####	#########	40	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####	#########	50	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####	#########	75	1.52E-01	1.30E-03	1.30E-02	1.87E-02
####	#########	100	4.35E+00	5.62E-02	6.31E-01	6.77E-01
####	#########	175	9.84E+00	1.66E-01	8.15E-01	1.96E+00
####	#########	300	8.52E+00	2.23E-01	9.06E-01	2.67E+00
####	#########	600	4.31E+00	1.96E-01	1.26E+00	3.19E+00
####	#########	750	1.70E+00	1.23E-01	1.17E+00	2.09E+00
####	#########	1000	3.53E-01	5.68E-02	2.90E-01	8.52E-01
####	#########	1200	6.12E-01	1.14E-01	5.81E-01	1.71E+00
####	#########	2000	2.73E-03	7.03E-04	3.58E-03	1.05E-02
####	#########	6	1.90E+01	1.32E-02	7.54E-02	9.35E-02
####	#########	11	1.89E+01	2.07E-02	1.18E-01	1.47E-01
####	#########	16	1.46E+01	2.30E-02	9.59E-02	1.70E-01
####	#########	25	2.30E+01	5.70E-02	2.37E-01	4.20E-01
####	#########	40	3.80E+01	1.10E-01	4.39E-01	1.00E+00
####	#########	50	5.20E+00	2.03E-02	8.10E-02	1.85E-01
####	#########	75	1.92E+01	9.86E-02	5.03E-01	9.35E-01
####	#########	100	2.33E+01	1.72E-01	8.48E-01	1.55E+00
####	#########	175	7.96E+00	6.81E-02	2.53E-01	8.19E-01
####	#########	300	4.43E+00	6.13E-02	2.17E-01	7.61E-01
####	#########	600	2.30E+00	4.83E-02	2.15E-01	6.95E-01
####	#########	750	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####	#########	1000	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####	#########	1200	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####	#########	2000	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####	#########	3000	0.00E+00	0.00E+00	0.00E+00	0.00E+00
####	#########	6	1.11E-01	1.36E-04	1.06E-03	1.05E-03
####	#########	11	2.71E-01	5.68E-04	4.42E-03	4.35E-03

####	#########	16	3.69E-02	8.67E-05	4.49E-04	8.54E-04
####	#########	25	5.68E-02	2.27E-04	1.17E-03	2.23E-03
####	#########	40	2.09E+00	6.72E-03	3.45E-02	1.16E-01
####	#########	50	1.44E+00	6.14E-03	3.15E-02	1.06E-01
####	#########	75	9.25E+00	7.19E-02	4.81E-01	9.03E-01
####	#########	100	1.20E+01	1.28E-01	7.97E-01	1.45E+00
####	#########	175	1.38E+00	1.73E-02	5.52E-02	2.25E-01
####	#########	300	1.24E+00	2.61E-02	7.35E-02	3.54E-01
####	#########	600	3.55E-01	1.43E-02	6.63E-02	2.31E-01
####	#########	750	0.00E+00	0.00E+00	0.00E+00	0.00E+00

CO2-Exhaust	SO2-Exhaust	PM-Exhaust	Crankcase	Hot-Soaks	Diurnal	Displacement
2.96E-02	6.10E-06	3.06E-06	0.00E+00	1.67E-07	7.96E-07	1.12E-05
1.92E+00	3.95E-04	1.96E-04	0.00E+00	6.50E-06	8.20E-05	7.25E-04
1.50E+00	3.09E-04	1.53E-04	0.00E+00	3.00E-06	3.79E-05	5.67E-04
6.76E+00	1.39E-03	6.90E-04	0.00E+00	1.17E-05	2.43E-04	2.55E-03
2.11E-01	4.36E-05	2.16E-05	0.00E+00	1.67E-07	7.61E-06	7.99E-05
1.52E-01	2.95E-06	1.60E-05	6.96E-07	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2.40E+00	4.67E-05	2.42E-04	5.99E-04	0.00E+00	0.00E+00	0.00E+00
1.74E-02	3.38E-07	1.75E-06	4.33E-06	0.00E+00	0.00E+00	0.00E+00
4.92E-01	9.56E-06	4.94E-05	1.23E-04	0.00E+00	0.00E+00	0.00E+00
2.54E+00	5.47E-04	2.21E-03	3.10E-05	0.00E+00	0.00E+00	0.00E+00
1.97E+00	4.24E-04	1.71E-03	2.40E-05	0.00E+00	0.00E+00	0.00E+00
1.99E+00	4.28E-04	1.35E-03	2.03E-05	0.00E+00	0.00E+00	0.00E+00
2.63E-01	5.65E-05	1.78E-04	2.68E-06	0.00E+00	0.00E+00	0.00E+00
6.57E-01	1.41E-04	4.31E-04	9.20E-07	0.00E+00	0.00E+00	0.00E+00
1.97E+00	4.24E-04	1.29E-03	2.76E-06	0.00E+00	0.00E+00	0.00E+00
3.68E+00	7.91E-04	2.26E-03	4.08E-06	0.00E+00	0.00E+00	0.00E+00
9.60E+00	2.06E-03	5.88E-03	1.06E-05	0.00E+00	0.00E+00	0.00E+00
2.26E+01	4.40E-03	9.69E-03	1.54E-05	0.00E+00	0.00E+00	0.00E+00
2.95E+01	5.74E-03	1.26E-02	2.01E-05	0.00E+00	0.00E+00	0.00E+00
3.97E+01	8.05E-03	2.30E-02	2.40E-04	0.00E+00	0.00E+00	0.00E+00
1.51E+02	2.98E-02	1.10E-01	1.24E-03	0.00E+00	0.00E+00	0.00E+00
1.97E+02	3.89E-02	1.08E-01	1.40E-03	0.00E+00	0.00E+00	0.00E+00
1.11E+02	2.12E-02	4.42E-02	6.31E-04	0.00E+00	0.00E+00	0.00E+00
6.35E+01	1.26E-02	2.72E-02	3.82E-04	0.00E+00	0.00E+00	0.00E+00
1.85E-02	3.97E-06	1.63E-05	2.37E-07	0.00E+00	0.00E+00	0.00E+00
5.15E-02	1.11E-05	3.53E-05	5.57E-07	0.00E+00	0.00E+00	0.00E+00
1.88E-01	4.04E-05	1.29E-04	2.03E-06	0.00E+00	0.00E+00	0.00E+00
4.29E+00	8.78E-04	2.61E-03	3.47E-05	0.00E+00	0.00E+00	0.00E+00
6.24E+00	1.28E-03	3.79E-03	5.05E-05	0.00E+00	0.00E+00	0.00E+00
1.39E+01	2.90E-03	1.19E-02	2.19E-04	0.00E+00	0.00E+00	0.00E+00
1.95E+01	4.00E-03	1.71E-02	3.29E-04	0.00E+00	0.00E+00	0.00E+00
3.99E+01	8.19E-03	2.41E-02	5.39E-04	0.00E+00	0.00E+00	0.00E+00
6.29E+01	1.27E-02	3.29E-02	7.60E-04	0.00E+00	0.00E+00	0.00E+00
6.77E+01	1.38E-02	3.33E-02	7.45E-04	0.00E+00	0.00E+00	0.00E+00
2.45E+01	4.98E-03	1.23E-02	2.60E-04	0.00E+00	0.00E+00	0.00E+00
1.68E+01	3.42E-03	9.71E-03	2.43E-04	0.00E+00	0.00E+00	0.00E+00

3.36E-01	6.82E-05	1.94E-04	4.86E-06	0.00E+00	0.00E+00	0.00E+00
9.59E-01	1.95E-04	5.54E-04	1.39E-05	0.00E+00	0.00E+00	0.00E+00
5.19E-02	1.12E-05	3.22E-05	8.72E-09	0.00E+00	0.00E+00	0.00E+00
3.81E-01	8.20E-05	2.37E-04	6.41E-08	0.00E+00	0.00E+00	0.00E+00
1.30E+00	2.79E-04	7.97E-04	1.73E-07	0.00E+00	0.00E+00	0.00E+00
9.47E+00	2.04E-03	5.83E-03	1.26E-06	0.00E+00	0.00E+00	0.00E+00
3.01E+01	5.62E-03	1.15E-02	2.53E-06	0.00E+00	0.00E+00	0.00E+00
2.23E+01	4.15E-03	8.47E-03	1.87E-06	0.00E+00	0.00E+00	0.00E+00
2.31E+01	4.59E-03	1.10E-02	6.66E-05	0.00E+00	0.00E+00	0.00E+00
1.56E+02	2.98E-02	1.06E-01	8.68E-04	0.00E+00	0.00E+00	0.00E+00
7.88E+02	1.50E-01	4.20E-01	3.99E-03	0.00E+00	0.00E+00	0.00E+00
9.77E+02	1.79E-01	3.62E-01	3.84E-03	0.00E+00	0.00E+00	0.00E+00
4.56E+02	8.75E-02	1.73E-01	1.95E-03	0.00E+00	0.00E+00	0.00E+00
2.55E+01	4.89E-03	9.85E-03	1.05E-04	0.00E+00	0.00E+00	0.00E+00
3.63E+01	6.98E-03	1.58E-02	2.22E-04	0.00E+00	0.00E+00	0.00E+00
1.87E+00	3.60E-04	8.15E-04	1.14E-05	0.00E+00	0.00E+00	0.00E+00
2.76E+01	5.30E-03	1.20E-02	1.69E-04	0.00E+00	0.00E+00	0.00E+00
1.22E+00	2.35E-04	5.32E-04	7.47E-06	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1.88E+00	3.66E-04	7.96E-04	1.53E-06	0.00E+00	0.00E+00	0.00E+00
3.15E-02	6.15E-06	1.34E-05	2.57E-08	0.00E+00	0.00E+00	0.00E+00
1.62E+00	3.30E-04	8.59E-04	1.04E-05	0.00E+00	0.00E+00	0.00E+00
2.16E+01	4.27E-03	1.25E-02	1.80E-04	0.00E+00	0.00E+00	0.00E+00
1.20E+02	2.38E-02	5.04E-02	8.61E-04	0.00E+00	0.00E+00	0.00E+00
2.02E+02	3.88E-02	6.33E-02	1.17E-03	0.00E+00	0.00E+00	0.00E+00
2.15E+02	4.28E-02	7.47E-02	1.36E-03	0.00E+00	0.00E+00	0.00E+00
1.50E+01	2.98E-03	5.42E-03	8.90E-05	0.00E+00	0.00E+00	0.00E+00
5.70E+00	1.13E-03	2.53E-03	5.50E-05	0.00E+00	0.00E+00	0.00E+00
3.64E-01	7.23E-05	1.62E-04	3.51E-06	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
9.84E-02	1.87E-05	3.90E-05	2.15E-08	0.00E+00	0.00E+00	0.00E+00
8.79E-01	1.76E-04	4.47E-04	3.46E-06	0.00E+00	0.00E+00	0.00E+00
9.52E+00	1.84E-03	6.55E-03	6.11E-05	0.00E+00	0.00E+00	0.00E+00
1.46E+02	2.83E-02	7.85E-02	8.43E-04	0.00E+00	0.00E+00	0.00E+00
4.02E+02	7.51E-02	1.54E-01	1.80E-03	0.00E+00	0.00E+00	0.00E+00
6.80E+01	1.32E-02	2.66E-02	3.27E-04	0.00E+00	0.00E+00	0.00E+00
8.94E+00	1.74E-03	3.57E-03	4.09E-05	0.00E+00	0.00E+00	0.00E+00
7.53E-01	1.36E-04	3.56E-04	2.48E-06	0.00E+00	0.00E+00	0.00E+00
1.09E+02	1.86E-02	3.49E-02	2.22E-04	0.00E+00	0.00E+00	0.00E+00
3.97E+02	7.29E-02	1.44E-01	1.25E-03	0.00E+00	0.00E+00	0.00E+00
3.68E+02	6.76E-02	1.34E-01	1.15E-03	0.00E+00	0.00E+00	0.00E+00
2.25E+02	4.13E-02	9.12E-02	8.40E-04	0.00E+00	0.00E+00	0.00E+00
9.46E+01	1.74E-02	3.83E-02	3.53E-04	0.00E+00	0.00E+00	0.00E+00
7.43E+02	1.36E-01	3.01E-01	2.77E-03	0.00E+00	0.00E+00	0.00E+00
2.46E+02	4.52E-02	9.97E-02	9.19E-04	0.00E+00	0.00E+00	0.00E+00
1.89E-02	4.06E-06	1.16E-05	3.31E-08	0.00E+00	0.00E+00	0.00E+00
3.53E-01	7.60E-05	2.18E-04	6.20E-07	0.00E+00	0.00E+00	0.00E+00
1.22E+01	2.39E-03	5.50E-03	1.35E-05	0.00E+00	0.00E+00	0.00E+00
1.83E+01	3.60E-03	8.27E-03	2.03E-05	0.00E+00	0.00E+00	0.00E+00

4.94E+01	1.01E-02	3.18E-02	3.70E-04	0.00E+00	0.00E+00	0.00E+00
3.94E+02	7.84E-02	3.05E-01	3.70E-03	0.00E+00	0.00E+00	0.00E+00
2.68E+02	5.34E-02	1.49E-01	2.11E-03	0.00E+00	0.00E+00	0.00E+00
2.53E+01	4.90E-03	1.05E-02	1.64E-04	0.00E+00	0.00E+00	0.00E+00
5.03E+01	1.01E-02	2.41E-02	3.62E-04	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
9.18E-02	1.98E-05	5.63E-05	1.00E-07	0.00E+00	0.00E+00	0.00E+00
7.30E+00	1.42E-03	3.12E-03	4.92E-06	0.00E+00	0.00E+00	0.00E+00
1.11E+01	2.15E-03	4.73E-03	7.46E-06	0.00E+00	0.00E+00	0.00E+00
2.12E+01	4.31E-03	1.23E-02	1.28E-04	0.00E+00	0.00E+00	0.00E+00
1.27E+02	2.49E-02	9.20E-02	1.03E-03	0.00E+00	0.00E+00	0.00E+00
4.59E+02	9.05E-02	2.51E-01	3.25E-03	0.00E+00	0.00E+00	0.00E+00
7.40E+02	1.42E-01	2.96E-01	4.22E-03	0.00E+00	0.00E+00	0.00E+00
9.91E+02	1.96E-01	4.24E-01	5.92E-03	0.00E+00	0.00E+00	0.00E+00
1.24E+02	2.45E-02	5.47E-02	6.88E-04	0.00E+00	0.00E+00	0.00E+00
7.53E+01	1.49E-02	3.85E-02	6.86E-04	0.00E+00	0.00E+00	0.00E+00
1.96E+01	3.88E-03	1.00E-02	1.79E-04	0.00E+00	0.00E+00	0.00E+00
1.99E+02	3.94E-02	1.02E-01	1.81E-03	0.00E+00	0.00E+00	0.00E+00
8.94E+00	1.77E-03	4.57E-03	8.14E-05	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3.19E+00	6.39E-04	1.64E-03	1.31E-05	0.00E+00	0.00E+00	0.00E+00
1.39E+02	2.68E-02	9.57E-02	9.10E-04	0.00E+00	0.00E+00	0.00E+00
4.37E+02	8.46E-02	2.35E-01	2.57E-03	0.00E+00	0.00E+00	0.00E+00
6.55E+02	1.23E-01	2.51E-01	2.99E-03	0.00E+00	0.00E+00	0.00E+00
5.99E+02	1.17E-01	2.35E-01	2.95E-03	0.00E+00	0.00E+00	0.00E+00
3.93E+02	7.65E-02	1.58E-01	1.83E-03	0.00E+00	0.00E+00	0.00E+00
1.06E+02	2.07E-02	4.84E-02	7.67E-04	0.00E+00	0.00E+00	0.00E+00
2.13E+02	4.14E-02	9.70E-02	1.54E-03	0.00E+00	0.00E+00	0.00E+00
1.31E+00	2.56E-04	5.99E-04	9.49E-06	0.00E+00	0.00E+00	0.00E+00
9.55E+00	2.05E-03	1.01E-02	1.84E-04	0.00E+00	0.00E+00	0.00E+00
1.50E+01	3.23E-03	1.58E-02	2.89E-04	0.00E+00	0.00E+00	0.00E+00
1.86E+01	4.01E-03	1.58E-02	3.36E-04	0.00E+00	0.00E+00	0.00E+00
4.61E+01	9.91E-03	3.90E-02	8.31E-04	0.00E+00	0.00E+00	0.00E+00
1.20E+02	2.48E-02	8.80E-02	1.77E-03	0.00E+00	0.00E+00	0.00E+00
2.21E+01	4.58E-03	1.62E-02	3.27E-04	0.00E+00	0.00E+00	0.00E+00
1.08E+02	2.26E-02	8.99E-02	1.77E-03	0.00E+00	0.00E+00	0.00E+00
1.90E+02	3.91E-02	1.62E-01	3.31E-03	0.00E+00	0.00E+00	0.00E+00
9.17E+01	1.89E-02	5.46E-02	1.29E-03	0.00E+00	0.00E+00	0.00E+00
8.95E+01	1.81E-02	4.66E-02	1.14E-03	0.00E+00	0.00E+00	0.00E+00
8.19E+01	1.66E-02	3.70E-02	8.83E-04	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1.40E-01	3.01E-05	9.69E-05	4.97E-07	0.00E+00	0.00E+00	0.00E+00
5.84E-01	1.26E-04	4.03E-04	2.07E-06	0.00E+00	0.00E+00	0.00E+00

1.12E-01	2.41E-05	6.77E-05	3.09E-07	0.00E+00	0.00E+00	0.00E+00
2.93E-01	6.30E-05	1.77E-04	8.09E-07	0.00E+00	0.00E+00	0.00E+00
1.59E+01	3.15E-03	7.31E-03	2.83E-05	0.00E+00	0.00E+00	0.00E+00
1.46E+01	2.88E-03	6.69E-03	2.59E-05	0.00E+00	0.00E+00	0.00E+00
1.28E+02	2.62E-02	7.58E-02	1.06E-03	0.00E+00	0.00E+00	0.00E+00
2.30E+02	4.60E-02	1.46E-01	2.30E-03	0.00E+00	0.00E+00	0.00E+00
3.66E+01	7.31E-03	1.60E-02	3.01E-04	0.00E+00	0.00E+00	0.00E+00
6.18E+01	1.21E-02	2.09E-02	4.24E-04	0.00E+00	0.00E+00	0.00E+00
3.11E+01	6.23E-03	1.26E-02	2.49E-04	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Spillage	RunLoss	TankPerm	HosePerm	FuelCons.	Activity	LF
6.70E-07	3.74E-07	0.00E+00	0.00E+00	3.01E+00	1.41E+00	7.80E-01
2.20E-05	1.78E-05	0.00E+00	0.00E+00	1.95E+02	5.49E+01	7.80E-01
1.72E-05	8.23E-06	0.00E+00	0.00E+00	1.53E+02	2.53E+01	7.80E-01
4.69E-05	3.20E-05	0.00E+00	0.00E+00	6.88E+02	9.85E+01	7.80E-01
6.70E-07	4.57E-07	0.00E+00	0.00E+00	2.15E+01	1.41E+00	7.80E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.26E+01	1.37E+01	6.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.58E+02	9.20E+01	6.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.58E+00	5.48E-01	6.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.32E+01	1.10E+01	6.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.25E+02	1.85E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.75E+02	8.26E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.76E+02	5.02E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.33E+01	4.63E+01	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.82E+01	3.13E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.75E+02	5.87E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.26E+02	7.02E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.49E+02	1.26E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.00E+03	1.80E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.61E+03	1.67E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.51E+03	1.69E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.34E+04	4.62E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.74E+04	4.28E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	9.78E+03	1.46E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.61E+03	4.33E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.64E+00	8.28E+00	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.56E+00	1.27E+01	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.66E+01	2.87E+01	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.80E+02	4.88E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.52E+02	4.97E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.23E+03	8.06E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.72E+03	8.19E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.53E+03	1.20E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.57E+03	1.05E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.99E+03	6.03E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.17E+03	1.41E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.49E+03	7.71E+01	4.30E-01

0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.97E+01	1.27E+00	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.49E+01	2.55E+00	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.60E+00	2.24E+01	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.38E+01	1.24E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.15E+02	2.55E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.39E+02	1.14E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.66E+03	2.35E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.97E+03	1.26E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.04E+03	9.74E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.38E+04	4.40E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.97E+04	1.64E+04	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.64E+04	1.20E+04	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.03E+04	3.18E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.25E+03	1.01E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.21E+03	1.18E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.66E+02	4.48E+00	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.44E+03	4.48E+01	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.08E+02	1.49E+00	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.66E+02	1.70E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.79E+00	2.71E+00	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.43E+02	9.06E+01	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.91E+03	8.77E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.06E+04	3.30E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.78E+04	3.38E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.90E+04	2.08E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.33E+03	8.93E+01	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.04E+02	2.57E+01	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.22E+01	1.35E+00	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.70E+00	5.26E+00	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.77E+01	3.81E+01	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.41E+02	2.92E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.29E+04	2.98E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.56E+04	4.99E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.01E+03	5.71E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.90E+02	3.42E+01	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.66E+01	1.35E+01	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	9.63E+03	1.28E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.51E+04	2.71E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.25E+04	1.53E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.99E+04	7.44E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.37E+03	2.35E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.57E+04	1.19E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.18E+04	2.92E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.67E+00	3.62E+00	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.13E+01	4.07E+01	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.08E+03	9.42E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.62E+03	1.05E+03	5.90E-01

0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.37E+03	2.08E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.49E+04	1.19E+04	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.37E+04	6.11E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.24E+03	3.17E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.45E+03	4.17E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.13E+00	1.04E+01	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.45E+02	5.48E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	9.79E+02	6.29E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.88E+03	8.89E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.12E+04	3.82E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.06E+04	9.67E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.55E+04	9.23E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.76E+04	6.77E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.09E+04	5.12E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.67E+03	2.50E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.73E+03	5.20E+01	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.76E+04	3.06E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.91E+02	1.14E+01	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.82E+02	1.42E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.23E+04	4.07E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.86E+04	9.21E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.79E+04	7.97E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.29E+04	4.04E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.47E+04	1.59E+03	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	9.39E+03	3.30E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.88E+04	5.73E+02	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.16E+02	2.56E+00	5.90E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.47E+02	6.41E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.33E+03	6.40E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.65E+03	4.93E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.09E+03	7.77E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.06E+04	1.29E+04	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.96E+03	1.76E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	9.60E+03	6.48E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.68E+04	7.88E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.12E+03	2.69E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.92E+03	1.50E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.24E+03	7.77E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.24E+01	9.02E+01	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.17E+01	2.21E+02	4.30E-01

0.00E+00	0.00E+00	0.00E+00	0.00E+00	9.91E+00	3.01E+01	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.59E+01	4.63E+01	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.41E+03	1.70E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.29E+03	1.18E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.13E+04	7.54E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.03E+04	9.82E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.23E+03	1.13E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.47E+03	1.01E+03	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.75E+03	2.89E+02	4.30E-01
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

HPAvg
3.50E+01
5.82E+01
9.86E+01
1.14E+02
2.50E+02
2.90E+01
0.00E+00
6.59E+01
8.00E+01
1.13E+02
4.94E+00
8.55E+00
1.42E+01
2.04E+01
5.44E+00
8.69E+00
1.36E+01
1.97E+01
3.25E+01
4.58E+01
6.07E+01
8.48E+01
1.32E+02
2.17E+02
4.21E+02
8.00E+00
1.45E+01
2.35E+01
3.15E+01
4.49E+01
6.18E+01
8.51E+01
1.32E+02
2.39E+02
4.47E+02
6.91E+02
8.69E+02

1.05E+03
1.50E+03
6.00E+00
7.97E+00
1.31E+01
2.15E+01
3.30E+01
4.58E+01
6.13E+01
9.17E+01
1.38E+02
2.33E+02
4.11E+02
7.19E+02
8.84E+02
1.20E+03
1.77E+03
2.35E+03
0.00E+00
3.94E+01
4.17E+01
6.40E+01
8.81E+01
1.45E+02
2.38E+02
4.12E+02
6.69E+02
8.83E+02
1.07E+03
0.00E+00
4.83E+01
5.95E+01
8.42E+01
1.41E+02
2.31E+02
3.42E+02
7.50E+02
1.61E+02
2.44E+02
4.20E+02
6.88E+02
8.68E+02
1.15E+03
1.79E+03
2.42E+03
1.35E+01
2.25E+01
3.34E+01
4.51E+01

6.14E+01
8.56E+01
1.26E+02
2.29E+02
3.46E+02
0.00E+00
0.00E+00
2.28E+01
3.44E+01
4.54E+01
6.17E+01
8.55E+01
1.36E+02
2.30E+02
4.19E+02
6.92E+02
8.66E+02
1.08E+03
1.87E+03
2.24E+03
0.00E+00
0.00E+00
5.80E+01
8.79E+01
1.36E+02
2.36E+02
4.25E+02
7.07E+02
9.23E+02
1.07E+03
1.47E+03
5.35E+00
8.42E+00
1.36E+01
2.13E+01
3.34E+01
4.52E+01
6.00E+01
8.64E+01
1.36E+02
2.38E+02
4.19E+02
0.00E+00
0.00E+00
0.00E+00
0.00E+00
0.00E+00
5.57E+00
9.47E+00

1.33E+01
2.27E+01
3.35E+01
4.43E+01
6.08E+01
8.39E+01
1.29E+02
2.43E+02
4.27E+02
0.00E+00

APPENDIX C
SUMMARY OF EMISSIONS

Based on:

1 metric tonne = 1.1023 ton (short ton)

Facility Material Handling System Rating

Materials Handling System/Train Unload:	7500	metric tonnes/hr	8267	tons/hr
Reclaim and Vessel Loading:	6500	metric tonnes/hr	7165	tons/hr

Projected Operation

Operating hours: 355 days/yr (Facility closed 10 days/yr)

	Stage 1	Stage 2	
Coal Throughput	25	44	MM metric tons per year
	28	49	MM tpy
Unit Trains	5	8	trains/day
Cars per Unit Train	125	125	cars/train
Coal per Car	100	100	tons/car
Onsite Tracks	5	8	number of tracks
Ships	328	614	ships/yr

	STAGE 1 Pollutant Emissions (tpy)								
Source	**NO_x**	**CO**	**VOC**	**SO_2**	**TSP**	**PM_{10}**	**$PM_{2.5}$**	**HAPS**	**CO2e**
FUGITIVE SOURCES									
Coal Transfer (except piles):									
Material Handling	-	-	-	-	0.52	0.18	0.03	-	-
Coal Piles:									
Wind Erosion	-	-	-	-	0.54	0.46	0.07	-	-
Material Handling	-	-	-	-	1.49	0.52	0.08	-	-
MOBILE SOURCES									
Maintenance/Operations Equipment:									
Combustion	3.92	1.29	0.32	0.16	0.34	0.28	0.28	0.01	869
Trains:									
Combustion (Off-site)	6.94	1.03	0.39	0.004	0.31	0.26	0.25	0.01	397
Fugitive (Off-site)	-	-	-	-	0.40	0.34	0.05	-	-
Combustion (On-site)	2.41	0.36	0.13	0.002	0.11	0.09	0.09	0.004	138
Fugitive (On-site)	-	-	-	-	0.48	0.41	0.06	-	-
Ships:									
Combustion (Off-site)	204	54	5.22	0.10	4.45	3.66	3.66	0.27	10,526
Combustion (On-site)	26	7.01	0.68	0.01	0.58	0.47	0.47	0.04	1,364
Total - All Sources, Onsite and Offsite	244	64	6.74	0.28	9.22	6.67	5.04	0.33	13,294
Total - Onsite Sources	33	8.66	1.13	0.18	4.06	2.42	1.08	0.05	2,371
Fugitives Only	-	-	-	-	3.04	1.58	0.24	-	-
Facility Equipment Only	3.92	1.29	0.32	0.16	2.89	1.44	0.46	0.01	869
Non-Mobile Sources Only	-	-	-	-	2.55	1.16	0.18	-	-

	STAGE 2 Pollutant Emissions (tpy)								
Source	**NO_x**	**CO**	**VOC**	**SO_2**	**TSP**	**PM_{10}**	**$PM_{2.5}$**	**HAPS**	**CO2e**
FUGITIVE SOURCES									
Coal Transfer (except piles):									
Material Handling	-	-	-	-	1.05	0.37	0.06	-	-
Coal Piles:									
Wind Erosion	-	-	-	-	1.08	0.92	0.14	-	-
Material Handling	-	-	-	-	2.62	0.92	0.14	-	-
MOBILE SOURCES									
Maintenance/Operations Equipment:									
Combustion	4.36	1.42	0.36	0.19	0.38	0.31	0.31	0.01	996
Trains:									
Combustion (Off-site)	12.2	1.82	0.68	0.01	0.55	0.45	0.44	0.02	699
Fugitive (Off-site)	-	-	-	-	0.70	0.59	0.09	-	-
Combustion (On-site)	4.68	0.70	0.26	0.003	0.21	0.17	0.17	0.01	268
Fugitive (On-site)	-	-	-	-	0.91	0.78	0.12	-	-
Ships:									
Combustion (Off-site)	366	97	9.37	0.17	7.98	6.56	6.56	0.49	18,881
Combustion (On-site)	49	13	1.27	0.02	1.08	0.89	0.89	0.07	2,554
Total - All Sources, Onsite and Offsite	437	114	12	0.39	17	12	8.91	0.59	23,397
Total - Onsite Sources	58	15	1.88	0.21	7.34	4.36	1.82	0.08	3,817
Fugitives Only	-	-	-	-	5.67	2.98	0.45	-	-
Facility Equipment Only	4.36	1.42	0.36	0.19	5.14	2.52	0.65	0.01	996
Non-Mobile Sources Only	-	-	-	-	4.76	2.21	0.34	-	-

Washington State Emissions in tons per year
2011 Emissions Inventory for Cowlitz County

Select Sources (full summary in separate worksheet)	**NO_x**	**CO**	**VOC**	**SO_2**	**TSP**	**PM_{10}**	**$PM_{2.5}$**	**HAPS**	**CO2e**	**DPM**
Point Sources	3,616	2,507	671	791	-	182	172	-	-	-
Non-Road Mobile (Land-based, non-locomotive)	389	3,718	592	1	-	48	46	-	-	24
Railroad	789	137	43	6	-	23	23	-	-	23
Ships (commercial marine vessels)	1,109	150	46	199	-	37	34	-	-	34
Total All Source Categories	10,382	36,142	16,919	1,020	-	1,872	971	-	-	164

APPENDIX D
PILE INFORMATION

Bulk Density of Coal: 817 kg/m3 min (PRB coal; source Description of Facilites, September 2011)
929 kg/m3 max

Pile Dimensions:

	average L (ft)	Sfc W (ft)	Sfc Acres	Peak H (ft)	Mean H (ft)
Pile 1	2350	233	12.57	85	25
Pile 2	2350	233	12.57	85	25
Pile 3	2350	233	12.57	85	25
Pile 4	2350	233	12.57	85	25

From Millennium Coal Export Terminal, Applicant's Purpose and Need Description, Dec 2013
Coal pads vary between 2200 to 2500 ft in length
85 approximate coal stack height

	metric tonne	ton	
Pile 1	367,000	404,548	*(Stage 1 and 2)*
Pile 2	394,000	434,311	*(Stage 1 and 2)*
Pile 3	375,000	413,367	*(Stage 2 Only)*
Pile 4	368,000	405,651	*(Stage 2 Only)*

1,504,000 metric tonnes, total storage capacity

	Stage 1	Stage 2	
Annual Coal Throughput:	27,557,783	48,501,697	tpy
Average Pile Turnovers/yr	33	29	

Pile Throughput:

Pile 1	13,290,021	11,835,188	tpy
Pile 2	14,267,761	12,705,897	tpy
Pile 3	--	12,093,176	tpy
Pile 4	--	11,867,437	tpy

APPENDIX E
PILE - WIND EROSION

(Methodology from AP-24, Section 13.2.5 and WRAP Fugitive Dust Handbook, Section 9.3)
Industrial Wind Erosion

Wind Erosion (emissions from pile activity are covered in Materials Handling (MH) section)
(Equation based on Western Regional Air Partnership [WRAP] Fugitive Dust Handbook, Section 9.3)

$$E(lb TSP/acre/yr) = 1.7 * \frac{s}{1.5} * \frac{365*(365-p)}{235} * \frac{f}{15} * r$$

Where:

s=	2.2	Silt Content, weight %. *(Mean value from EPA AP-42, Section 13.2.4, Table 13.2.4-1, Coal-fired Power Plants (as received).)*
p=	175	Number of Days with >= 0.01 inches of precipitation per year. (NCDC Climate Summary for Longview, 1931-2006.)
f=	8.78	Percentage of Time that the unobstructed wind speed exceeds 12 mph at mean pile height. *(Calculated from Weyerhaeuser Mint Farm Met Station Data, 2001-2003 (wind speed monitor at 10 meter height; mean pile height (by exposed area) ~ 25 ft (7.6 m).)*
r=		Particulate Matter Size Ratios (WRAP Fugitive Dust Handbook, Section 9.3).
	1	TSP
	0.85	PM10
	0.13	PM2.5

Uncontrolled Emission Rates:

TSP	431	lb/acre/yr
PM10	366	lb/acre/yr
PM2.5	56	lb/acre/yr

Controlled Emissions:

Control %: 90 *WRAP Fugitive Dust Handbook, Table 9-4, Watering.*

Exposed Pile Area	Acres
Pile 1	12.57
Pile 2	12.57
Pile 3	12.57
Pile 4	12.57

	Stage 1	Stage 2	
Total Area	25.14	50.28	acres

Total Controlled Emissions:

Pollutant	Stage 1	Stage 2	
TSP	0.54	1.08	tpy
PM10	0.46	0.92	tpy
PM2.5	0.07	0.14	tpy

APPENDIX F
MATERIAL HANDLING

Transfer Operations (Pile Construction, Pile Removal)

(Methodology from AP-24, Section 13.2.4)
Aggregate Handling and Storage Piles

$$E\,(lb\ /\ ton\ ) = k * 0.0032\ * \left\{ \frac{\left(\frac{U}{5}\right)^{1.3}}{\left(\frac{M}{2}\right)^{1.4}} \right\}$$

Where:

k=		Aerodynamic Particle Size Multiplier. *(EPA AP-42 Section 13.2.4.)*
	1	TSP
	0.35	PM10
	0.053	PM2.5
U=	5.04	Mean Wind Speed, mph. *(Calculated from Weyerhaeuser Mint Farm Met Station Data, 2001-2003 (wind speed monitor at 10 me*
M=	4.5	Material Moisture Content, percent. (Mean value from EPA AP-42, Section 13.2.4, Table 13.2.4-1, Coal-fired Power Plants (as received). This value fits range given in Description of Facilities, September 2011 (1-6% surface; 13-18% total).)

Uncontrolled Emission Rates:

TSP	1.04E-03	lb/ton
PM10	3.64E-04	lb/ton
PM2.5	5.51E-05	lb/ton

Controlled Emissions:

Control %:	90	*WRAP Fugitive Dust Handbook, Table 9-4, Watering.*
Natural Precipitation Mitigation Factor:	(365-P)/365	*EPA AP-42, Section 13.2.2*
P=	175	Number of Days with >= 0.01 inches of precipitation per year. *(NCDC Climate Summary for Longview, 1931-2006.*

	Stage 1	Stage 2	
Annual Coal Throughput:	27557783	48501697	tpy
Annual Coal Throughput x2 (pile construct and reclaim):	55115565	97003394	tpy

Total Controlled Emissions:			
Pollutant	Stage 1	Stage 2	
TSP	1.49	2.62	tpy
PM10	0.52	0.92	tpy
PM2.5	0.08	0.14	tpy

All Other Coal Handling Operations (Transfers, Conveyors)

All enclosed operations with dry fogging. Equipment is cleaned using a wet scraping technique; assumed cleaning particulate emissions are zero.

Uncontrolled Emission Rates (same methodology as above):

TSP	1.04E-03	lb/ton
PM10	3.64E-04	lb/ton
PM2.5	5.51E-05	lb/ton

Controlled Emissions:

	Control %:	99	*Assumed control from full enclosure and any additional spray/fogging*
Natural Precipitation Mitigation Factor:	(365-P)/365		*EPA AP-42, Section 13.2.2*
	P=	175	Number of Days with >= 0.01 inches of precipitation per year. (NCDC Climate Summary for Longview, 1931-2006.

	Stage 1	Stage 2	
Annual Coal Throughput:	27557783	48501697	tpy

Emission/Transfer Points:

Rail Dump	1	1
Transfer Tower 1	1	1
Transfer Towers 2-4	1	1
Transfer Towers 5-7	1	1
Surge Bin (WP9)	1	1
Surge Bin (WP10)	0	1
Transfer Tower 8	1	1
Conveyor to Ship	1	1

Total Controlled Emissions:			
Pollutant	Stage 1	Stage 2	
TSP	0.52	1.05	tpy
PM10	0.18	0.37	tpy
PM2.5	0.03	0.06	tpy

APPENDIX G
COAL CAR FUGITIVE EMISSIONS

(Methodology from AP-24, Section 13.2.5 and WRAP Fugitive Dust Handbook, Section 9.3)
Industrial Wind Erosion

Wind-related losses from Train Transport of Open Coal Cars
(Equation based on WRAP Fugitive Dust Handbook, Section 9.3))

$$E(lbTSP/acre/yr) = 1.7 * \frac{s}{1.5} * \frac{365*(365-p)}{235} * \frac{f}{15} * r$$

Where:

s=	2.2	Silt Content, weight %. *(Mean value from EPA AP-42, Section 13.2.4, Table 13.2.4-1, Coal-fired Power Plants (as received).)*
p=	175	Number of Days with >= 0.01 inches of precipitation per year. *(Calculated from Weyerhaeuser Mint Farm Met Station Data, 2001-2003. (Note: AP-42 Figure 13.2.2-1 shows 180 days, and NCDC Climate data indicates ~ 177*
f (moving train)=	100	Percentage of Time that the unobstructed wind speed exceeds 12 mph at mean pile height. *(Assumed 100% of time for moving train.)*
f (sitting train)=	8.78	Percentage of Time that the unobstructed wind speed exceeds 12 mph at mean 'pile' height. *(Calculated from Weyerhaeuser Mint Farm Met Station Data, 2001-2003 (wind speed monitor at 10 meter height; train car height with coal load = ~15 ft (4.6 m)).)*
r=		Particulate Matter Size Ratios (WRAP Fugitive Dust Handbook, Section 9.3).
	1	TSP
	0.85	PM10
	0.13	PM2.5

Uncontrolled Emission Rates for Moving Trains:

TSP	4905	lb/acre/yr
PM10	4170	lb/acre/yr
PM2.5	638	lb/acre/yr

Uncontrolled Emission Rates for Sitting Trains:

TSP	431	lb/acre/yr
PM10	366	lb/acre/yr
PM2.5	56	lb/acre/yr

Train car exposed surface area:	518	ft2
Area/coal amount (by 1 car):	5.18	ft2/ton coal

	Stage 1	Stage 2	
Annual Coal Throughput:	27557783	48501697	tpy
Coal/car:	100	100	tons
Cars/train:	125	125	cars
Total Exposed Area:	3274	5763	acres

Off-site	Stage 1	Stage 2	
Distance from main rail line to site:	8.09	8.09	miles
Time Moving Car Exposed:	0.43	0.43	hrs

Offsite Emissions:

Pollutant	Stage 1	Stage 2	
TSP	0.40	0.70	tpy
PM10	0.34	0.59	tpy
PM2.5	0.05	0.09	tpy

On-site	Stage 1	Stage 2		
Onsite loop distance:	1.50	1.65	miles	
Dumper facility loop:	13236	13236	ft	(HDR Engineering track figures, 10/28/11)
	2.51	2.51	miles	
Total onsite distance for transport:	4.01	4.16	miles	Includes only loaded travel; assumes full cars for complete staging loop and dump loop distances.
Train Speed:	10	10	mph	
Time Moving Car Exposed:	0.40	0.42	hrs	
Waiting Time:	0.40	0.42	hrs	Conservative estimate for time waiting to unload.
Unloading Time:	2.10	2.60	hrs	*Millennium Bulk Terminals DRAFT Rail Plan* , HDR, November 15, 2011.
Time Sitting Car Exposed:	1.45	1.72	hrs	Assume time of exposure during unloading is only 1/2 of total unloading time.

Onsite Emissions:

Pollutant	Stage 1	Stage 2	
TSP	0.48	0.91	tpy
PM10	0.41	0.78	tpy
PM2.5	0.06	0.12	tpy

APPENDIX H
LOCOMOTIVE EMISSIONS

	Stage 1	Stage 2		
Coal Throughput	27557783	48501697	tons/yr	
Coal/car	100	100	tons	
Unit Trains (cars/train)	125	125	cars	
Unit Trains Required	2205	3880	Trains/yr	
	4	4	Locomotives/Train (full)	*Millennium Bulk Terminals DRAFT Rail Plan*, HDR, November 15, 2011.
	3	3	Locomotives/Train (empty)	*Millennium Bulk Terminals DRAFT Rail Plan*, HDR, November 15, 2011.
	7200	8500	ft train length	*from Longview Switching Company Line Capacity Analysis to Accommodate MBTL trains, HDR, Tech Memo Jan 2012*
Engine Size:		4400	hp/locomotive	*Millennium Bulk Terminals DRAFT Rail Plan*, HDR, November 15, 2011: GE AC4400CW (4400hp) or ElectroMotive Diesel SD70Ace (4300hp)
Locomotive Fuel Use:		20.8	bhp-hr/gal	(conversion for large line-haul locomotive *Emission Factors for Locomotives, EPA, Office of Transportation and Air Quality, EPA-420-F-09-025, April 2009*.)

Fuel Use per Train	Stage 1	Stage 2		
ON SITE				
Full Loaded Train:	5%	5%	Percent Load	(Notch percentage presented in Port of Long Beach Air Emissions Inventory - 2011 (POLB, July 2012); derived from EPA data
	880	880	hp	
	42	42	gallons/hr	
Empty Train:	5%	5%	Percent Load	
	660	660	hp	
	32	32	gallons/hr	
OFF SITE				
Full Loaded Train:	28%	28%	Percent Load	(Notch percentage presented in Port of Long Beach Air Emissions Inventory - 2011 (POLB, July 2012); derived from EPA data
	4928	4928	hp	
	237	237	gallons/hr	
Empty Train:	28%	28%	Percent Load	
	3696	3696	hp	
	178	178	gallons/hr	

Longview Short Line (Longview Switching Company (LSC) Track				
Distance from Main Rail Line to Site	8.09	8.09	miles	*Longview Switching Company Line Capacity Analysis to Accommodate MBTL trains, HDR, Tech Memo Jan 2012*
Travel Time to Site:	0.43	0.43	hrs	*Longview Switching Company Line Capacity Analysis to Accommodate MBTL trains, HDR, Tech Memo Jan 2012*
Total Power:	732214	1288697	hp-hr/yr	
Total Fuel Use:	35203	61957	gallons/yr	
Onsite				
Onsite loop distance:	7921	8727	ft	Per train average loop distance (HDR Engineering track figures, 10/28/11
Travel Distance:	1.50	1.65	miles	(one loop onsite; does not include dump track time which is operated by electric indexing system
Estimated Speed:	10	10	mph	From MBTL *Traffic Report*, URS 5/23/2014 (Draft)
Time per Train:	0.15	0.17	hours	
Total Power:	254660	493827	hp-hr/yr	
Total Fuel Use:	12243	23742	gallons/yr	
Total Fuel Use (On and Offsite)	47446	85698	gallons/yr	

Emission Factors

		NOx	CO	VOC	SO2	TSP	PM10	PM2.5	HAPS	CO2	CH4	N2O	CO2e
Tier 0 (most pre-2001 engines)[1-4]	(g/bhp-hr)	8.60	1.28	0.48	0.006	0.39	0.32	0.31	0.01				
GHG Factors[5,6]	(g/gal)									10150	0.80	0.26	10247

Sources:
[1]NOx, CO, VOC, PM10, PM2.5 emission factors from: *Emission Factors for Locomotives*, EPA, Office of Transportation and Air Quality, EPA-420-F-09-025, April 2009. Table 1, Line-Haul Emission Factors. From text: $P_{2.5}$ = 0.97* PM_{10}.
[2]SO2 emission factor from: *EPA AP-42, Section 3.4 Large Stationary Diesel and All Stationary Duel-fuel Engines* (10/96). Factor from Table 3.4-1 using S content of 15 ppm (Year 2014 sulfur content requirement (40 CFR 80)).
[3]TSP emission factor from: *EPA AP-42, Section 3.4 Large Stationary Diesel and All Stationary Duel-fuel Engines* (10/96). Based on ratio of total particulate to PM10 in diesel engines, as given in Table 3.4-2 (note: this ratio method matches PM2.5 factor as well).
[4]HAP emission factor from: *EPA AP-42, Section 3.4 Large Stationary Diesel and All Stationary Duel-fuel Engines* (10/96). Total HAPs from Tables 3.4-3 and 3.4-4, sum of HAPs as indicated by footnote b. For diesel fuel: 7000 Btu/hp-hr.
[5]*Direct Emissions from Mobile Combustion Sources*, EPA, Office of Air and Radiation, EPA-430-K-08-004, May 2008. CC_2 from Table B-1; N_2O and CH_4 from Table A-6.
[6]Global Warming Potentials (GWPs): CO_2 - 1; CH_4 - 25; N_2O - 298

Emission Rates (tpy)

		NO_x	CO	VOC	SO_2	TSP	PM_{10}	$PM_{2.5}$	HAPS	CO2	CH4	N2O	CO2e
Stage 1													
	Offsite	6.9	1.0	0.39	0.004	0.31	0.26	0.25	0.01	394	0.03	0.01	397
	Onsite	2.4	0.36	0.13	0.002	0.11	0.09	0.09	0.00	137	0.01	0.004	138
	Total	9	1.4	0.52	0.01	0.42	0.35	0.34	0.01	530	0.04	0.01	535
Stage 2													
	Offsite	12	1.8	0.68	0.01	0.55	0.45	0.44	0.02	693	0.05	0.02	699
	Onsite	4.7	0.70	0.26	0.003	0.21	0.17	0.17	0.01	265	0.02	0.01	268
	Total	17	2.5	0.94	0.01	0.76	0.63	0.61	0.03	958	0.08	0.02	967

APPENDIX I
CARGO VESSEL EMISSIONS

Tugs/Ship	3		(Conservative estimate)
Tug Engine Size (propulsion)	2000	hp	
Total Tug Engines/Ship	6000	hp	
Tug Positioning Time	3	hrs/ship (in-out)	(Conservative estimate)
Tug Load Factor	31%	Percent Load	(Engine load factor for Assist Tugs, from Port of Long Beach Air Emissions Inventory - 2011 (POLB, July 2012).)
Ship Auxilliary Engine Size	500	hp	(Conservative estimate)
Ship Berth Time	14	hrs	

	Stage 1	Stage 2	
Coal Throughput	27,557,783	48,501,697	tons/yr
Ships/yr	328	614	
Annual Power	2,357,573	4,413,261	hp-hrs/yr
Annual Diesel Fuel Use	16,503	30,892.83	MMBtu/yr
	120,791	226,114	gallons/yr
Tugs/yr	984	1,842	
Annual Power	5,490,720	10,278,360	hp-hrs/yr
Annual Diesel Fuel Use	38,435	71,949	MMBtu/yr
	281,318	526,614	gallons/yr

Emission Factors

lb/MMBtu, fuel input

	NO_x	CO	VOC	SO_2	TSP	PM_{10}	$PM_{2.5}$	HAPS	CO2	CH4	N2O	CO2e
Large Diesel Engines	3.2	0.85	0.0819	0.0015	0.0697	0.0573	0.0573	0.00428	165	0.0081	0.0004	165

Source:
Emission factors from: *EPA AP-42, Section 3.4 Large Stationary Diesel and All Stationary Duel-fuel Engines* (10/96). Assume Sulfur content of 0.0015% by weight (15 ppm). Assume TSP to PM10 ratio from Table 3.4-2, and PM2.5=PM10.
Sum of HAPs factors from Table 3.4-3 and 3.4-4.
Global Warming Potentials (GWPs): CO_2 - 1, CH_4 - 25, N_2O - 298

For Offsite (off dock) Ship Travel (within 5 mile distance from site), use :

Emission Factors from EPA's Greenhouse Gas Inventory Protocol Core Module Guidance, Optional Emissions from Commuting, Business Travel and Product Transport. EPA430-R-08-006, May 2008.

	Emission Factor for Product Transport			
	CO_2 (kg/ton-mile)	CH_4 (g/ton-mile)	N_2O (g/ton-mile)	CO_2e (kg/ton-mile)
Ship Transport	0.048	0.0041	0.0014	0.0485

Travel Distance:

Ship Miles	5	miles	Estimated from berth site in Longview, west along Columbia River to Pacific Ocean, plus 3 nautical miles out to sea.

CO_2e Emissions:	Stage 1	Stage 2	
Ship	7369	12970	tpy

Assume emissions of other pollutants for this activity are prorated from CO2e emissions.

Emission Rates (tpy)

	NO_x	CO	VOC	SO_2	TSP	PM_{10}	$PM_{2.5}$	HAPS	CO2	CH4	N2O	CO2e
Stage 1												
Ships (Cargo Vessel) - Docked (Onsite)	26	7.01	0.68	0.01	0.58	0.47	0.47	0.04	1361	0.07	0.003	1364
Ships (Cargo Vessel) - (Offsite)	143	38	3.65	0.07	3.11	2.55	2.55	0.19	7355	0.36	0.02	7369
Tugs (Offsite)	61	16	1.57	0.03	1.34	1.10	1.10	0.08	3171	0.16	0.01	3177
Total	231	61	5.90	0.11	5.02	4.13	4.13	0.31	11887	0.58	0.03	11911
Stage 2												
Ships (Cargo Vessel) - Docked (Onsite)	49	13	1.27	0.02	1.08	0.89	0.89	0.07	2549	0.13	0.01	2554
Ships (Cargo Vessel) - (Offsite)	251	67	6.43	0.12	5.47	4.50	4.50	0.34	12945	0.64	0.03	12970
Tugs (Offsite)	115	31	2.95	0.05	2.51	2.06	2.06	0.15	5936	0.29	0.01	5947
Total	416	110	10.64	0.19	9.05	7.44	7.44	0.56	21429	1.05	0.05	21471

APPENDIX J
OPERATIONS AND MAINTENANCE EQUIPMENT

Equipment Information

Equipment Type	Estimated Engine Size (hp)	Fuel	Number of Units Stage 1	Number of Units Stage 2	EPA SCC Number	EPA NONROAD model combustion emission factor (tons/yr per unit) THC-Exhaust	CO-Exhaust	NOx-Exhaust	CO2-Exhaust	SO2-Exhaust	PM-Exhaust
Loader (miscellaneous use)	300	Diesel	1	1	2270002060	2.81E-01	1.14E+00	3.47E+00	7.40E+02	1.42E-01	2.96E-01
Bobcat (sump cleaning)	50	Diesel	1	2	2270002057	7.50E-03	4.18E-02	1.29E-01	1.83E+01	3.60E-03	8.27E-03
10-Ton Truck (sump cleaning)	300	Diesel	1	2	2270002051	3.06E-02	9.01E-02	3.12E-01	1.09E+02	1.86E-02	3.49E-02
Crane (miscellaneous use)	50	Diesel	1	1	2270002045	1.27E-05	6.42E-05	2.24E-04	3.15E-02	6.15E-06	1.34E-05
Forklift (miscellaneous use)	40	Propane	1	1	2267002057	5.20E-05	1.84E-03	2.95E-04	1.52E-01	2.95E-06	1.60E-05
Maintenance Trucks (eg. Ford F150)	300	Gasoline	4	4	2265003070	1.14E-04	4.20E-03	3.12E-04	2.11E-01	4.36E-05	2.16E-05

Note:
For PM_{10}, $PM_{2.5}$, and HAPs, use same emission ratio as emission factor ratios for Large Diesel Engines (see Construction worksheet): PM_{10} and $PM_{2.5}$ ratio to TSP, and; HAPs ratio to CO.

Annual Emissions (tpy)

STAGE 1 (tpy)	NO_x	CO	VOC	SO_2	TSP	PM10	PM2.5	HAPS	CO2e
Loader (miscellaneous use)	3.47	1.14	0.28	0.14	0.30	0.24	0.24	0.01	740
Bobcat (sump cleaning)	0.13	0.04	0.01	0.00	0.01	0.01	0.01	0.0002	18
10-Ton Truck (sump cleaning)	0.31	0.09	0.03	0.02	0.03	0.03	0.03	0.0005	109
Crane (miscellaneous use)	0.0002	0.0001	0.00001	0.000006	0.00001	0.00001	0.00001	0.0000003	0.03
Forklift (miscellaneous use)	0.0003	0.002	0.00005	0.000003	0.00002	0.00001	0.00001	0.00001	0.2
Maintenance Trucks (eg. Ford F150)	0.001	0.02	0.0005	0.0002	0.0001	0.0001	0.0001	0.0001	1
Stage 1 Total (tpy)	3.92	1.29	0.32	0.16	0.34	0.28	0.28	0.01	869

STAGE 2 (tpy)	NO_x	CO	VOC	SO_2	TSP	PM10	PM2.5	HAPS	CO2e
Loader (miscellaneous use)	3.47	1.14	0.28	0.14	0.30	0.24	0.24	0.01	740
Bobcat (sump cleaning)	0.26	0.08	0.01	0.01	0.02	0.01	0.01	0.00	37
10-Ton Truck (sump cleaning)	0.62	0.18	0.06	0.04	0.07	0.06	0.06	0.00	218
Crane (miscellaneous use)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
Forklift (miscellaneous use)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
Maintenance Trucks (eg. Ford F150)	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	1
Stage 2 Total (tpy)	4.36	1.42	0.36	0.19	0.38	0.31	0.31	0.01	996

APPENDIX K

Washington State Emissions in tons per year

2011 Emissions Inventory

APPENDIX M
STATEWIDE GHG EMISSIONS FROM TRANSPORT

Emission Factors from EPA's Greenhouse Gas Inventory Protocol Core Module Guidance, Optional Emissions from Commuting, Business Travel and Product Transport. EPA430-R-08-006, May 2008

	Emission Factor for Product Transport			
	CO_2 (kg/ton-mile)	CH_4 (g/ton-mile)	N_2O (g/ton-mile)	CO_2e (kg/ton-mile)
Rail Transport	0.0252	0.002	0.0006	0.0254
Ship Transport	0.048	0.0041	0.0014	0.0485

Travel Distance:

Rail Miles	450	miles	Estimated distance from main rail connector in Longview, south to Portland, east to Tri-Cities area, and northeast to Spokane.
Ship Miles	64	miles	Estimated from berth site in Longview, west along Columbia River to Pacific Ocean, plus 3 nautical miles out to sea

	Stage 1	Stage 2	
Coal Throughput	27557783	48501697	tons/yr

CO_2e Emissions:

	Stage 1	Stage 2	
Train	347602	611780	tpy
	0.32	0.55	$MMtCO_2e/yr$
Ship	94328	166018	tpy
	0.09	0.15	$MMtCO_2e/yr$
Total CO_2e	0.4	0.7	$MMtCO_2e/yr$

Washington State 2010 GHG Inventory in million metric tons per year ($MMtCO_2e/yr$))
(from Department of Ecology, *Washington State Greenhouse Gas Emissions Inventory 2009-2010*, Publication No. 12-02-034, December 2012, Revised September 2013)

		Percent of Statewide CO_2e	
	$MMtCO_2e$	Stage 1	Stage 2
Total Transportation	42.2	1.0%	1.7%
Total Gross Emissions	96.1	0.4%	0.7%

Submission Number: ***MBTL-SEPA-DEIS-0000925***

Received: 5/24/2016 5:13:20 PM
Commenter: Mary Risley
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the opportunity to add my voice to that of others in supporting the environmental study for the proposed port at Longview. The DEIS will present a clear picture of how Millennium Bulk Terminals will proceed in opening and operating this port and the economic, environmental, and social benefits of this project are deserving of approval. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn't have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don't hold them up any longer. Sincerely, Mary Lou Risley marylou.risley@cldpk.com 82716

Submission Number: ***MBTL-SEPA-DEIS-0001766***

Received: 6/2/2016 4:46:09 PM
Commenter: Jeff Ritchie
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. This draft EIS is exhaustive and quite frankly, overreaching. For instance, because the proposal is a terminal proposal, the use of the bulk commodity by a third party is a superseding and intervening cause to the combustion of coal. As a result of these superseding causes, the construction and operation of the terminal is not a proximate cause of the combustion of coal. Enough already! This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible.

Submission Number: ***TRANS-LV-M2-00121***

Received: 5/24/2016 12:00:00 AM
Commenter: Ryan Rittenhouse
Organization: Friends of the Columbia Gorge
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

How you all doing? Thank you. My name is Ryan Rittenhouse (phonetic). I work with Friends of the Columbia Gorge, friends that support the no action alternative in the DEIS. Millennium's proposed export terminal would cause harm to the Columbia River Gorge National Scenic Area and communities throughout the Northwest.

Every loaded train that would deliver coal to this facility would pass through the Columbia River Gorge Scenic Area and in uncovered cars. There is already a well-documented issue of coal dust blowing off and falling off existing coal trains and contaminating air and water.

In 2016, coal dust continues to be discharged from existing coal trains traveling through the Columbia River Gorge. BNSF Railway have deployed vacuum trucks to remove coal dust and debris from the area around the tracks and the area along the shoreline of the Columbia River.

But the areas that have been treated are already covered with a new layer of coal debris. This photo taken in 2015 shows coal debris blowing off a passing coal train near Columbia Hills State Park near the Native American petroglyph, She who watches. Obviously the surfactant that was applied did not work very well.

These photos were taken in April and May of 2016 show the coal vacuuming truck at work along Columbia River near Columbia Hills State Park and also the new layer of coal dust accumulated after the area has been treated.

These photos also show the coal dust is still polluting our parks, communities, waterways, and the national scenic areas. Proposed mitigation measure in the DEIS are completely inadequate. Again the Friends support the no action alternative.

On a personal note, I have been many places along the BNSF rail line all the way from Wyoming to here in Longview and every place I've worked near the tracks within five minutes I have found coal dust. It comes off the trains everywhere, it gets into the water everywhere. It already is a problem everywhere. Please say no.

Submission Number: ***TRANS-PASCO-M1-00037***

Received: 6/2/2016 12:00:00 AM
Commenter: Ryan Rittenhouse
Organization: Friends of Columbia Gorge
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. Thank you for this opportunity to testify. My name is Ryan Rittenhouse (phonetic) I work for the Friends of Columbia Gorge. I'm here to ask you to please not support this project.

There has been a lot of misinformation going around about this coal dust issue. Especially here in the local paper lately claiming it doesn't exist, claiming there's no problem. But there is a problem and there still is a problem even after the re-spraying facility of the Pasco was put up.

I have photos here, and we have submitted photos already. There are pictures of trains going through the Gorge having major blow out events with coal dust coming off of them even after they have been at the re-spray station in Pasco. BNSF has sent out giant vacuum trucks to suck up inches layered -- thick layers along the railroad tracks in certain areas out in the Gorge.

So coal dust does exist. It's real. It's not an imagination. It's not a lie. And there's a study by the University of Washington that looked into this and found significant pollution impacts.

There's a lot of talk about jobs. We're here to talk about the Draft Environmental Impact Statement. It has nothing to do with jobs. It's not pertinent. Even if it were, there's only so many jobs you can get from the energy sector. And if we keep investing our jobs into dirty fossil fuel energy, those are jobs that are not going to renewable jobs. This small amount of jobs is going to supplant many more jobs we can get from renewable energy.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000498***

Received: 5/19/2016 1:07:40 PM
Commenter: Virgil Rittenhouse
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed Millennium Bulk Terminal would provide. The project would create work right away during construction, and plenty more jobs would stay around to run the terminal. Plus, all of those wages generated would trickle back into our local and state economies. At a time when our state unemployment rates are below the national average, we cannot miss big opportunities for new business like this one. Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

DAVID JOEL RITTER

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☐ Greenhouse Gas
- ☐ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☒ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

My comment is based on the economic future of our community's. For the past 5 years I have lived in Kelso, our local economy and small businesses have taken one economic set back after another

When are we going to stop with this hype about coal dust, Noise, and ~~fear~~ stop listening to out of State Enviromentalists, attorneys decide our futurers.

(additional space is provided on the back)

(comment continued)

Case NOTE! I own a 2001 Freightliner Show Truck! I park within 10 meters of the BNSF train tracks, I have NO COAL DUST settling on my trucks hood, Cab, windsheilds, Entry steps! NO COAL DUST! IF the dust is so bad how come my ~~Peterbilt~~ [redacted] Custom truck is still clean?

Is it a fact or a lie?

Submission Number: ***TRANS-LV-M2-00064***

Received: 5/24/2016 12:00:00 AM
Commenter: Mike Ritter
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Mike Ritter (phonetic). Thank you for letting me speak on this proposed project. I don't think one person here wants coal here. They just want jobs. That's it. I am positive that our kids will not be excited about working there. They won't call grandma and grandpa about their new profession. They will hesitate telling their friends knowing coal is not the future.

I blame the county and city officials for this mess. They should have brought a company that Longview would be proud of. The County should hire a sales team and sell the city and not to come back until they found a manufacturing company that will employ more than 135 coal jobs and make Longview a place that people want to move to instead of away from. How hard is it really to bring a company that no one else wanted?

Submission Number: ***MBTL-SEPA-DEIS-0000468***

Received: 5/17/2016 7:38:13 PM
Commenter: Susan Ritz
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal located in Cowlitz County, be accepted as thorough and sufficient. Our exported coal conforms to high environmental and safety standards. Unlike other parts of the world, namely China, where dirty coal and poor safety standards have killed hundreds of our brother and sister miners. Delaying this project will not end coal usage overseas but it will shift coal production to places where people and environment do not matter. Cowlitz County continues to have a high unemployment rate. We need these jobs and we've paid a high cost with this drawn out permitting process so far. It's time to stop the delay and bring about development and economic relief. I'm certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

Submission Number: ***MBTL-SEPA-DEIS-0002460***

Received: 6/10/2016 2:10:08 PM
Commenter: Darren Rivers
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The draft environmental study for Millennium Bulk Terminals coal export facility was sufficient. Please move forward. There are many benefits of the project that the community is waiting for. Media coverage would have us believe that transporting coal by rail through our state is unprecedentedâ€"it’s not. We’ve transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage?

Submission Number: ***MBTL-SEPA-DEIS-0001464***

Received: 5/30/2016 5:47:14 PM
Commenter: Donna Roach
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am a Montana citizen living in the Missoula area. I am delivering my wish that the permit to create a bulk terminal for the export of coal at Longview WA be denied. In my opinion the DEIS for this project does not take into consideration the impacts of up to 16 additional coal trains passing through our city every day. The Missoula valley is subject to frequent weather inversion events trapping dirty air close to the valley floor resulting in significant health risks for people having to breathe this polluted air. The diesel fumes created by 16 additional trains is not good for the anyone in the valley, but especially people with respiratory problems. In addition to air quality impacts, there are on-grade crossings in the Missoula area (one in particular that is critical for access to an entire neighborhood)that will be impacted negatively by the increase in rail traffic. The tracks bisect our town, running right through the downtown area and rolling very close to residential neighborhoods which will be impacted by fumes, dust, noise, and vehicular congestion. These impacts are not discussed in the DEIS for areas along the rail route outside of Washington. More important than these local effects are the planetary effects of continuing to invest in an economy that is reliant on the utilization of coal as an energy source. I will admit that when the alarm first went out about fossil fuels and the threat of global warming I was something of a skeptic. However in the face of continued warnings from the scientific community and my own observations of changes in weather trends evident all around me, I have become quite frightened by the prospects of a world dramatically altered by the effects of rising greenhouse gas concentrations in the atmosphere caused by the combustion of fossil fuels, of which coal is the most damaging. I've heard the term "alarmist" used to describe people like me who feel we are endangering the future of our children and of human society. I have become convinced that we are indeed facing a crisis equal or greater than we have faced in history and that everyone should be greatly alarmed. We have just begun a journey (already possibly too late) to try to stave off the worst effects of a warming climate, and to willfully invest in infrastructure that continues the damage is insane at best. It's ridiculous to consider that this infrastructure which is solely designed and built to distribute climate destroying coal won't have a deleterious effect on the crisis. Jobs and trade are ever evolving scenarios. My husband lost his job of 30 years with the demise of the timber industry in Western Montana, but (not without hardship) we survived and life continues. I feel sorry for the people that will be impacted by our necessary switch away from fossil fuels as our main energy source, but it's something we must do. It is absolutely imperative that we move away from carbon based energy in all forms (most of all coal). For this and the other reasons brought forth above, I ask you to deny the permit for the construction of the Longview coal export facility. Thank you for your consideration. Donna Roach

Submission Number: ***MBTL-SEPA-DEIS-0003836***

Received: 6/14/2016 1:20:33 AM
Commenter: Jim Roach
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments
Submission Text
Jim:

My name is Jim Roach. I've been a Missoula resident for 45 years. I don't understand why it's draft Environmental Impact Statement doesn't address impacts for rail traffic in Montana. That seems sort of ridiculous. It seems like a rip off. On behalf of my family, and my friends, and a lot of people that I know are neighbors, I just want to say we don't want any more coal dust. We don't want any more diesel fumes. We don't want any more threat of derailment. We don't want traffic complications from increased rail traffic. We don't want the noise.

Most of all we don't want the climate impact. We don't want the endless smoky summers. We don't want the low stream flows and the sick fish. We don't want the reduced fishing opportunities. We don't want increased beetle kill. We don't want disappearing biodiversity. We don't want damage to agriculture. We don't want the drought. We don't want climate refugees. We don't want shut downs of skiing areas. We don't want this action, no action. Thank you.

Steve Running: Yes, I want to particularly point out what I see happening in the global coal markets and global carbon cycle science. That's the stage that I work in, global carbon cycles. We, probably a decade ago, first identified really clearly that the biggest single carbon emission by humanity is burning coal for electric power. It became clear to us right at that point that everything else we do in trying to reduce carbon emissions wasn't going to matter at all if we didn't, first and highest priority, quit burning coal for electric power.

That was over a decade ago. It didn't seem like we were making much progress until about the last year. I can finally say that we've had a pretty good year in global policies. Obviously we all know about the Paris Climate Agreement where every nation signed on to a commitment for driving down carbon emissions, and for most countries that first biggest carbon emission is burning coal for electric power.

What's more immediately relevant to us here is that China not only signed the Paris Agreement, but China actually does a 5-year strategic plan for the nation. What a concept to actually plan the future of your nation. We've got learn something here. In the last 5-year plan, China has publicly announced that they will quit importing coal. What we're clearly seeing is that in 2014 and 2015, China's coal imports went down by actual statistics, so they're making good on this strategic plan that they've announced.

They are starting to drive down their purchasing of imported coal. Of course, their 2 biggest sources are Australia and us. They have already announced that they have a strategic objective to quit buying coal. I can't imagine a worse time for America to be building more coal infrastructure when the biggest customer has already announced publicly that they're going to quit buying. This is really almost a no-brainer.

What I also see now in this last year is that the world financial community has really started to catch on that long-term fossil fuel investment, and particularly long-term coal infrastructure investment, is just plain a bad idea. It's a bad investment. You have very high probability of losing your investment with the trajectory of the global economy and energy. When the world bank and Goldman Sachs, I read almost every week another major financial institution announcing that they are getting out of coal investment ... What we see here is the local version of that same decision point.

You would think this ought to be an easy decision, that the last thing the Pacific Northwest would want to do is invest in long-term infrastructure for coal export when a major customer has already announced that they're going to be capping their imports. I think this is to me, at the global scale that I work at and study and follow, this really should be a pretty easy decision then. This is certainly not a terminal that we want locally, but that even makes any sense in terms of a larger financial picture. It just doesn't make sense one bit. I think that's what I want to leave with you on this topic. Thank you.

Paul Smith: I'm really happy to get a chance to comment on the health implications of the increasing coal shipments by rail for our communities and others. It's easy to make the case that negative health impacts with coal will occur because they've been occurring for the last several hundred years. There's no reason to think a little bit more is better.

I hope to stress the health threats local to Missoula and also stress that this new threat will be greatest on the vulnerable, including children, infants, the unborn, and the elderly. I also have a list of references that I always feel nervous talking and making statements without. If anybody wants the list of the references that at least give the health implications, please see me. Because I take care of children and infants with lung disease, obviously my main concern at the local level is the increase in air pollution from these diesel fumes, coal dust, and worsening climate change.

Data is substantial showing that coal trains do increase bloom concentrations. Diesel emissions are recognized as carcinogens, which was previously noted, and contain toxic substances such as polyaromatic hydrocarbons and particulate matter or PM. Coal dust also adds to air pollution in the form of particulate matter. Of the 6 criteria of air pollutants that the EPA is mandated to regulate, particulate matter is perhaps one of the easiest to track and to correlate with health effects.

It's generated a vast amount of medical literature. We know there is PM increase as public health worsens. We also know that when we lower particulate matter, population health improves. That's an important concept and lends significant credibility to particulate matter being culpable, and justifies action that lowers air pollution. Particulate matter leads to lung damage and diseases such as asthma and COPD. Children are at the highest risk because their lungs are developing and they have more life years of exposure.

This often worsens over decades from accumulating scar tissue along the airways by repeated injury. We have no cure for asthma. For today's living asthmatic children, they may end up being tomorrow's asthmatic cripples. In health, particulate matter also leads to diseases distant from the lungs such as heart disease, stroke, and cancer and even adverse effects on pregnancies and fetal tissue. Infants born to a mother exposed to high concentrations of particulate matter are born smaller, and with impaired lung function.

These more systemic effects outside of the lung happen in part because fine particulate matter can also cross pulmonary system directly into the circulation and they release whatever poisons they contain. Missoula already struggles with air quality in a large part because of our valley inversions that attract pollutants. Despite strong efforts to decrease particulate matter, we often, here in Missoula, are close to the prescribed threshold by the EPA for particulate matter.

There is no safe lower threshold. The more time one spends in high exposure of particulate matter, the greater the effects. Again, this is of special concern to children. Another health concern with coal dust is increased chance of train derailments. You might recall an article in the Missoulian last year quoting the Department of Transportation estimating that there would be over 10 derailments per year in the US of trains carrying nothing but ethanol and oil cargo alone. Missoula is a very populated area. It's time we realize that with only 2 hospitals in our town, we would struggle to handle the type of derailment disaster that hit Quebec killing 47 and devastating a small

town.

Then finally the effects of coal combustion on climate change are already significant here in Montana. As it was noted, we've already come through 2 of the warmest years on records and the warmest April on record. Our snow pack is already lower than normal this year and it's disappearing. Our farmers and ranchers are threatened. Increased forest fires and hot weather will again threaten our health and our children's health.

By way of closing, one of my favorite quotes when giving a talk like this is from CF Elliot in 1909. He was then secretary of Anaconda Copper Mining Company. He stated, "We have the perfect right to carry on a legitimate business and if incidentally we should pollute the atmosphere nobody has the right to complain until specific damage gives them a cause of action." This statement really describes the position that we're in as a company.

We can't stop a process legally until we can show harm. By then, the ground, the air, and the water are contaminated, and our children are sick and it's too late. So ask yourself when we're coming through these discussions what angles are we heading in? Is the public being shouldered with the responsibility to prove harm or is the impetus on the industry to prove there's no harm? Harm to health has already been shown. There is specific cause for us to halt more pollution.

John: Good evening. I'm John Woodland. I retired in January as the Superior, Montana Fire Chief. I'm speaking from my background in emergency services, I do speak for myself. Superior is one of the many small towns along the rail line that this project will negatively impact. Emergency services and access to many of my district's neighborhoods require crossing the tracks. That's true of many other towns along the rail line. This is what's hauling our water supply across the tracks.

I personally waited at a grate crossing for a train to pass while on an emergency service response. This proposal lacked the train traffic. It increased the likelihood emergency services will be negatively impacted in communities all along the tracks. The tracks in Mineral County in places are built right along steep mountainsides next to the Clark Fork of the Columbia River. Trains fall off these tracks sometimes into the river and not that infrequently.

In my 10 years as the fire chief there have been 2 trains in the river in Mineral County. One visible from my home, included empty oil cars, and the other dumped Boeing fuselages into the Albertan Gorge. More traffic means more wrecks. More traffic will also mean more pressure not to hold up the trains for maintenance work which means yet again more wrecks. For Montana, Eastern Washington and Idaho, it also means less access and higher prices to ship agricultural products. For emergency services, today the 800-pound gorilla in the room is climate change.

If you don't think that's emergency service issue just look at the newspaper for the last week, at the evacuation of between 80 and 90,000 people from Ft. McMurray in May in

Northern Alberta, months before there's supposed to be a fire season in that part of the country. This is the future for the entire inter-mountain west if we don't act decisively now with climate change. We cannot continue to invest in fossil fuel projects, such as Longview, and have any chance of limiting the worst impacts of climate change. I urge you to say to no to the Longview Coal Port and yes to acting decisively on climate change now before it's too late.

Michael: My name is Michael Daniel Bolt. I'm a student at the University of Montana. I'm running for House District 98, Montana State District. I think preventing any new coal mining is the best choice. I'm also interested in bringing ideas of increasing government control over the natural resource industry including the coal industry. I believe government run operations of the coal industry would allow us to shut down that industry more responsibly and make any future natural resources extraction use projects really more beneficial to the Montana people. That's the main concession. That's all. Thank you.

Carolyn: Hello, my name is Carolyn Walker. I used to be Carolyn Alderson. I lived along the Tongue River for 20 years of my life. I raised my 3 children there. There is an interesting story about a law and a regulation that actually stopped something. When I lived down there, the Northern Plains Resource Council, I was part of it, was just beginning. That's when you all heard of the Tongue River Railroad. The Tongue River Railroad was thought of and started because there was a mining plan for that area, right on the Tongue River. It was called the Montco Mine.

Well there's a nice picture of me shaking hands with President Carter in 1977 at the signing of the strip mining bill. In that bill there's a piece of the legislation that says, "There shall be no strip mining on Alluvial Valley Floors." The Montco Mine was right on the Tongue River. It caused some difficulty in the community. I just wanted you to know that there are ways to use legislation and rules to stop bad things from happening. My recommendation is that we recommend no action on the Longview Port.

Jim: My name is Jim Parker. I live in Missoula Montana. As a Montanan along the rail corridor between the Powder River Basin mines and the proposed terminal I oppose the Millennium Bulk Terminals because of the associated increase in coal train traffic through my community. The increased coal train traffic will bring with it increased air pollution and health risks from increased coal dust and diesel exhaust and increased noise pollution.

In addition, the increase in coal traffic through my community will reduce access across the tracks and cause traffic delays for citizens, commuters, for emergency response vehicles when there's a medical emergency or fire, or a need for police. The additional train traffic will also provide greater potential for vehicle collisions with trains and for pedestrian accidents.

As a Missoulian and Montanan, I'm asking that the EIS fully analyze and consider the impacts of this port and the increased coal train traffic would cause here in Missoula and across Montana especially as it relates to the above sited impacts. The proposed project’s impacts are real and significant to Montanans and are connected in cumulative

result of what happens if this project is approved.

The EIS prepared by the court in the Washington Department of Ecology in Cowlitz County must include all the connected and cumulative impacts in Montana that will result if the MBTL facilities are approved and constructed. These include the significant connected and cumulative impacts on the project all the way back through Montana to the Power River Basin Coal Mines in Montana and Wyoming.

The increased rail traffic in Montana must be addressed, analyzed, and its consequences fully considered in the EIS. More trains in Montana will mean an increase in the amount of airborne pollutants, from diesel engines as well as from coal dust. Medical studies have shown a clear link between both diesel air pollutants and coal dust and disease.

While those with chronic disease, the elderly, young children, and pregnant women are most at risk, the health effects from particulate matter exposure may occur years later. Even healthy individuals need to be concerned. These issues must be addressed, analyzed, and their consequences fully considered in the EIS. The MBTL facility will directly lead to an increase in the burning of coal. The link between increased coal burning and associated public health problems cannot be ignored and should be included, analyzed, and the consequences fully considered in the EIS.

Finally, because the sole purpose of the MBTL facility is to facilitate the shipping of coal being transported from the PRB to its final destination in Asia, where it will be burned for energy, I also believe that the EIS must fully consider the long term and direct effects that this action will have on the global climate.

In conclusion, I strongly oppose the proposed Millennium Bulk Terminals Longview facility. The connected and cumulative impacts to Missoula, and all of Montana, from the proposed facility, are real and significant. The EIS prepared by the co-lead ggencies for this project must address, analyze, and consider all the connected and cumulative impacts this proposal will have on Montana. Please reject this proposal and take no action.

Thank you.

Harold: I'm Harold Hoem from Missoula. The whole town of Butte Montana went through a long period of horrible air quality early in this century because of ore smelting. Read a book called Smoke Wars. People sickened and then died especially underground miners like my grandfather who was cut down in the prime of life by lung disease. The corporate giants called the air pollution a nuisance. It was deadly. Oh, what a nuisance Biff was to my family.

What are some corporations proposing to do this century later but ship Montana coal overseas so citizens there can get sick and die from nuisance called coal? A friend of mine who was a former coal mine manager says this, "The problem with the coal mining industry is the product is a poison”. We know that CO2 is increasing dramatically. It is now over 400 parts per million. Humanity hasn't seen this stuff but it is affecting climate

change dramatically.

The current wildfire in Ft. McMurray in Alberta Canada caused the evacuation of over 88,000 people. The smoke from each building is hundreds of miles away. Perhaps a wake-up call for Montana. We have rapidly declining snow pack and are facing longer and harder, tired, and more dangerous fire seasons and possibly worse than Iroquois. For sure a nuisance for residents and a real downer for tourism. The DEIS gives Montana a scant potential.

They say 16 additional coal trains a day would go through Missoula that cite inflated numbers for existing traffic of 25 to 28 trains. We currently see only 13 to 15 trains. 16 more trains would double current traffic. The effects would ripple down all the impacts of safety risks, derailments, noise, dust, the laser crossings et cetera. They should know where our current capacity is and give assurances that deficiencies will be mitigated. My last word , bring down CO2 emissions by switching to renewables. Vote no action. Show the US means business in climate litigation.

Gary: I'd first like to thank Northern Plains and the Hoems in particular for it, and Les Anderson coming all the way from Longview to speak here. The speakers, it's been a very nice haven. Thanks for this opportunity to comment. Hi there, I'm Gary Mattson. I live in West Riverside, which is a suburb of Milltown. I really seriously, if the most serious effects of this port certainly have to do with health and climate change.

For those reasons, I am just baffled that so many people either ignore the science, or deny the science, or simply don't know about the science. I cannot understand why we have so many people that are not supportive of recognizing climate change demand. Some of the effects aren't realized. I can see in my community. Milltown has one singal entrance to it across on the south side of Powder River, there is one railroad crossing.

If that railroad crossing was blocked, no emergency services can occur. Our fire chief manager will recognize that concern. In Missoula County that's 10. That has a significant impact. The additional of 16 trains would really be a big impact on emergency services. For multiple reasons, I would strongly recommend that no action alternative.

George: Thank you, thank you all for being here. My name is George Price. I was asked to represent an organization I belong to named Indian People's Action. Indian People's Action asked me to be here as an environmental issues coordinator.

I would like to put our input collectively in here; just the fact the basis what coal is doing to our climate and the life on earth. I think that should be enough reason to keep it in the ground, not transport it anywhere. Anybody who's paying attention and looking at how fast this is escalating climate change to an unpredictable level at levels with all the other elements that are being released. Rising sea levels, you can go down the whole list if anybody's honest about that, you would say yes, let's stop all of this.

I'd also like to say let's look at the paradigm shift and deeply question a society that creates incentives for people to write environmental impact statements that are

intentionally lying to the people for profit, for money in a society that lives for money. I'm not going to go into my whole historian's diatribe there. I had often wondered what if the people who came from across the ocean, and likeminded people that welcomed innovation in Massachusetts had come to learn instead of to control. It's great. Can we start on the right foot now? I recommend the no action on behalf of Indian People's Action of Montana.

Dave: Hi, my name is Dave Dittloff. I'm the regional representative for National Wildlife Federation. Most of you are probably aware of National Wildlife Group. We're the folks who put on Ranger Rick Magazine. That's our biggest identifier here with the kids.

In 3, 4 years that that's going to take, yet there's nothing coming back up the streams in order to spawn salmon. The impacts are almost certainly down to relating to some of the impacts here. Last year, last summer's conditions literally had most of the species dying, most of the adults coming back to the rivers and streams here to the headwaters of the Columbia River Basin died due to high temperatures, directly related to climate change.

I want to talk a little about, quickly here's something that hasn't been hit hard today, talk about wildlife. It starts right from the beginning. You look at the mine site here, the direct habitat displacement, the coal recommendation that follows it, that impacts wildlife. If you look at what happens on the mine sites with water, that impacts fish and wildlife. The next connector we look at has it transferred over? We look at the trains. There's been a lot of talk about human health and consequences here which are really important. Those same impacts are related to wildlife for particularly the fisheries here. That coal dust gets in the streams. There's mercury concern with it here and other neurological issues are a concern.

Mercury is bad for people eating the fish as well. We've got dozens of streams and multiple dozens of lakes in Montana that had mercury consumption warnings here. You can only eat so much of the fish. That's an impact to wildlife. You look at the ports, same thing here. The direct construction of the ports, this place is habitat for sure. That has real consequences to the fisheries. You'll see salmon come in and out of the ocean as well here.

Lastly, climate change, I got to talk to you about salmon. Name a critter, even the biggest critters, white tail deer, elk, etc. that think generalist that those are for generalist. There's impacts here. More and more research that's done it's really impact of Montana's out pour heritage, it's culture, what we like to do here whether it's sightseeing, hunting, fishing, what have you here. Fishing is a multi-billion dollar industry in Montana and the Pacific Northwest. There's economic reasons associated with wildlife as well here. I appreciate it. No action alternative makes sense for wildlife.

Dave Jones: Hello, my name is David Jones. I've been a fly fishing guide in Montana for over 30 years. Dave just inspired me to get up here and talk about what I see in my career fishery that I work primarily in. My season has been shortened by an average of about 6 weeks in the 30 years I've been doing this. We don't have clients in August anymore at all because of

the low flows. Half the time our rivers are shut down because we have to worry about railing over there. Anybody that watches the forester around in the spruce moss and the beetle kill, it's just obvious that Montana is being really affected. We mentioned the economic impact, but really we're talking genocidal, ecocidal impacts for climate change. We ought to think in those terms really. This is an emergency. I recommend no action on the terminal. Thank you.

Steve: Hi, my name is Steve Schwartz. I live here in Missoula. I'm a professor interior of the Department of Communication Studies at the University of Montana. I teach and do research in environmental communication. No matter what the coal industry says about the free market, their goal is to get government on their side to make the market work for them whether it's supporting carbon cash receipt frustration, whether it's blocking the clean power plan, or supporting coal export infrastructure like MBT as a goal. It's past time for us to use our voice to remind government agencies who's side they need to be on and who's interest they need to represent.

The connected and key note we've heard about tonight on public health and safety, on air, land, and water, on wildlife, and on climate change are common in house. They're shared by the residents of the Pacific Northwest, shared in common by the people who live in Washington and Idaho and here in Montana. We all deserve a voice in this decision. For that reason, I want to thank all the organizations that have made this opportunity possible for so many of us to express our voices. To protect the commentators in the Department of Ecology, to take no action, thank you.

Jim: My name is Jim Roach. I've been a Missoula resident for 45 years. I don't understand why it's draft Environmental Impact Statement doesn't address impacts for rail traffic in Montana. That seems sort of ridiculous. It seems like a rip off. On behalf of my family, and my friends, and a lot of people that I know are neighbors, I just want to say we don't want any more coal dust. We don't want any more diesel fumes. We don't want any more threat of derailment. We don't want traffic complications from increased rail traffic. We don't want the noise.

Most of all we don't want the climate impact. We don't want the endless smoky summers. We don't want the low stream flows and the sick fish. We don't want the reduced fishing opportunities. We don't want increased beetle kill. We don't want disappearing biodiversity. We don't want damage to agriculture. We don't want the drought. We don't want climate refugees. We don't want shut downs of skiing areas. We don't want this action, no action. Thank you.

Claudia: My name is Claudia Narcisco. I am speaking for myself today. When I was trying to find some things that I was going to speak about, I found an old letter that I had written in I guess November 2013. There goes my letter. I had it on my phone and mailed it to myself. Anyway, it was hard enough to read. I emphasized that connection actions between the mine and the port and Asia and the impacts on climate change and how it would cycle back to us.

I requested that they consider this. I cited a section of the National Environmental Policy

Act. I believe it was section F2 or 2F that specifically directed agencies to consider international ramifications of actions which is not something that we normally associate with, but it's just that it was our responsibility to do that. Obviously those things were not necessarily done, as far as I could tell, to this point.

I hope that's considered.

Submission Number: ***TRANS-SPOKANE-M1-00037***

Received: 5/26/2016 12:00:00 AM
Commenter: Jim Roach
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Jim Roach, and I live in Missoula, Montana.

I stand in opposition of this proposal. The Draft Environmental Impact Statement is incomplete and inadequate in discussing local rail impact outside of the state of Washington. Here's what it misses.

Increased diesel fumes, our city is subject to wind and air inversions when people are encouraged not to drive cars or sometimes even venture outside. What will be the effect of 16 more trains running per day through our town.

Increased coal dust, the tracks run right through our historic downtown and residential neighborhoods. The DEIS calls coal dust a nuisance. It's a nuisance we don't want.

Noise, we have too much already. We don't want more.

Traffic congestion and blockage to neighborhoods, we don't want it. There's critical on-grade crossings already causing problems in Missoula.

Increased chance of derailment. This railroad follows the Clark Board River for over 200 miles through Montana. We don't want to risk this precious resource to possible derailments and coal spills.

Worse than the impact, local impact, of rail traffic is the climate changing impacts which are terrifying and they're happening now. I have a whole list of them, but I don't have time to read them. So we already know it's happening, and it's really scary.

-disappearing glaciers and decreased snowpack
-we see it in reduced stream flows, resulting in stressed fish, less fishing opportunities, and fewer guide days for outfitters
-we see it in forests turning brown from beetle kill
-we see it in longer and more intense fire seasons - bringing unhealthy air, less access to the mountains, less camping, greater threats to the urban - wildland interface, and lots of other problems
-we see it in more frequent droughts affecting agriculture and our ability to produce food

Worldwide we're seeing a loss of biodiversity unprecedented in human history. World ecosystems are facing pervasive loss of habitat, greater threats from invasive species, mass extinctions.

An increase in the supply of coal will surely create more global warming. It will induce demand, greater supply will create lower prices, and more nations and corporations will choose coal power.

You have to ask why, why would we invest this way?
As a society, we're feeling the effects of climate change now and hearing the warnings of the scientific community. We're trying to figure out how to reduce carbon emissions, and we're trying to figure out how to sequester more carbon out of the atmosphere.
Why would we even consider investing in infrastructure that facilitates the extraction, distribution, and combustion of the most horrendous form of fossil fuel we have? It's irresponsible.

Submission Number: ***MBTL-SEPA-DEIS-0003340***

Received: 6/13/2016 9:16:29 PM
Commenter: Mitch Roach
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001226***

Received: 5/26/2016 6:04:51 PM
Commenter: Trista Roach
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. MBT has received a thorough and comprehensive draft EIS review one five years in the making. If we don’t take the next step forward and turn this vision into a reality, it’s going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. Cowlitz County is fraught with uncertainty. Millennium’s proposal, however, offers all the economic benefits of a long-term port facility without any of the uncertainty. Coal is needed by other countries to help shape their future and enhance their quality of life. Let's give other countries the living standards we have for ourselves.

Submission Number: ***MBTL-SEPA-DEIS-0002044***

Received: 6/6/2016 7:06:01 PM
Commenter: john robbins
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I strongly oppose the proposed coal export terminal. As a resident of Portland, I care deeply about the environment in the Columbia Gorge and about global warming pollution. This project would only increase the amount of global warming pollution and put the environment of the gorge and the local communities affected at risk. Please deny this proposed project. The environment, future generations, and the planet will be grateful to you.

Submission Number: ***MBTL-SEPA-DEIS-0000321***

Received: 5/11/2016 1:54:21 AM
Commenter: Robert
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please do not consider this coal terminal. The world has enough problems without it. It will only create more pollution and hazards for all life in the NW. /thanks

Submission Number: ***MBTL-SEPA-DEIS-0001552***

Received: 5/31/2016 5:05:23 PM
Commenter: Geri Roberts
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward.

Submission Number: ***MBTL-SEPA-DEIS-0000551***

Received: 5/19/2016 5:57:36 PM
Commenter: Leonard roberts
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please consider my comments on the DEIS of the proposed Cowlitz County coal export terminal. This is an excellent project and one that will bring broad-ranging economic benefits to Washington and to the national economic outlook for years to come. In regards to coal dust & human health impacts: Please refer to the American Lung Association's report on state / county rankings. First please note that the incidence of pediatric and adult asthma for Cowlitz Co is 9.1%, Clark Co. is 9.0%, and Yakima Co is 8.9%. Then compare this same statistic to communities where coal is produced or shipped through such as Campbell Co WY at 9.0%, Box Butte Co, NE (Alliance) 6.96%, Lincoln Co NE (North Platte) 6.98%, or St. Louis Co MO 7.68%. Further, the ALA ranking for 24 hr particulate matter in Campbell Co WY scores a grade of B, as compared to Clark Co WA at F and Yakima Co WA at F. The evidence is obvious, coal production and transportation is not causing a health problem, but it can act as a remedy to an economic downturn. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium's proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Roberts, Rob (0186)

Submission Number: ***MBTL-SEPA-DEIS-0000186***

Received: 5/10/2016 3:24:11 PM
Commenter: Rob Roberts
Organization: Protect our Winters
State: Maryland

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
We are against the marine terminal for export of coal in Cowlitz County WA. Endangering the surrounding areas and increasing the negative environmental imapcts coal creates. We support clean energy sources, such as solar, and respect of the peoples and cultures of the area to live and breathe safe, clean air.

Submission Number: ***MBTL-SEPA-DEIS-0003046***

Received: 6/13/2016 5:00:03 PM
Commenter: Robbie Roberts
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study should move forward in a timely manner. Please allow me to provide my comments in regards to the draft EIS. GHG from the use of coal and nationwide rail capacity should not have been included in this study, but now that they've been included and thoroughly studied, it's time to move this proposal forward! It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment. Sincerely, Robbie Roberts Robo3857@gmail.com 81625

Submission Number: ***MBTL-SEPA-DEIS-0000506***

Received: 5/19/2016 5:08:34 PM
Commenter: Sharon Roberts
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My comments pertain to the draft EIS for the Longview coal export facility. I hope you will give them good consideration. This draft EIS is exhaustive and quite frankly, overreaching. For instance, because the proposal is a terminal proposal, the use of the bulk commodity by a third party is a superseding and intervening cause to the combustion of coal. As a result of these superseding causes, the construction and operation of the terminal is not a proximate cause of the combustion of coal. Enough already! The draft EIS to evaluate Millennium Bulk Terminals proposed Longview project should be kept within reason. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with the process in a timely manner. It's the fair thing to do.

Submission Number: ***MBTL-SEPA-DEIS-0002112***

Received: 6/7/2016 5:09:21 PM
Commenter: Will Roberts
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life.

Submission Number: ***MBTL-SEPA-DEIS-0000192***

Received: 5/10/2016 3:55:32 PM
Commenter: marc robertson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Coal is past its "prime" & is LEADING CAUSE OF AIR POLLUTION in the 21rst century & we cannot continue to burn it without regard for the air we need to breath let alone the environmental issues associated with the extraction, shipping & ultimately the burning of it. If we are to be true leaders in the capitalist world we created, then we need to be setting examples for the rest of the world that coal & gas usage is not the answer to our energy needs & focus our attention on developing & using solar, wind & other renewable technologies for our energy needs.

Submission Number: ***MBTL-SEPA-DEIS-0002949***

Received: 6/13/2016 3:27:43 PM
Commenter: Michael Robertson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***TRANS-LV-M2-00004***

Received: 5/24/2016 12:00:00 AM
Commenter: Frank Robindaris
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Frank Robindaris (phonetic). I drove up here this morning from Eugene, Oregon. I'm a river guide and river outfitter, and I've been in that occupation for the last 30 years. I've seen a lot of changes in our environment and our region, lots of additional industry that some of it's been good.

And I would ask you to consider this that expanding coal transport, export into Asia from a port on the Columbia River is just not a very good idea. In my experience -- my annual experience I have about 3,000 people that come visit me on the McKenzie River in Oregon.

I've always made a living in the tributaries of the Columbia River. It reminds me we're all connected together here and that what happens here in town will definitely affect a lot of us that live down in Eugene. Folks come to Oregon. They come visit me. They go fishing with us, rafting. They have a high expectation that Oregon is green, and beautiful, and clean, and not sullied with the dust from coal.

So, again, I would like you to really consider that what you're doing today just doesn't affect the people here, but it reaches far out beyond this community, that it will have big effect on towns, in the tributaries like Eugene and Springfield, like Madras and Redmond. So, please no coal in the Pacific Northwest. We really don't need it.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001928***

Received: 6/5/2016 5:50:40 PM
Commenter: Bob Robinson
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Robert B. Robinson Box 163 Kingston, ID 83839 June 5, 2016 Millenneum Bulk Terminal EIS c/o ICF International 710 Second Avenue Suite 550 Seattle, WA 98104 Dear Sir or Madam: I am writing in support of the Millennium Bulk Terminal development. The project will be a great benefit to wage-earners in the region. Resource industries and transportation traditionally provide living-wage, non-seasonal employment. These are the kind of good job opportunities that the U.S. needs so much in this time poor job creation. The export sector is a crucial component of the Washington economy. Modern permitting and regulatory procedures minimize a project's environmental impacts and risks. I have looked over the EIS for the project, and I feel there are adequate safeguards to allow the project to proceed in a beneficial manner. The Cumulative Impacts part of the permitting process seems speculative and far-fetched. I feel like the permitting process is practically designed to make resources-based economic development very difficult or impossible. The permitting process needs to be streamlined in order for valuable projects to be developed with less delay. An unfortunate situation exists where the 'opposition' to resource projects is organized and can readily mount communication campaigns against project development. On the other hand, the wage-earners who will benefit from development cannot even know who they are at this point, and certainly have no organization comparable to the 'opposition'. The one exception to this may be labor unions acting in favor of development. In summary, the MBT represents a large investment that will provide much needed, living-wage jobs in the region. The nation suffers from the lack of creation of high-wage jobs in traditional industries, and every job created is valuable. The Washington export economy needs this type of investment to modernize and grow. The EIS process will necessitate development with minimal impact and risk. The EIS process allows anti-development forces unrealistic opportunities to slow or stop needed investment. This opposition is very hard on wage-earners in modern times. The process should improve the environmental aspects of projects and reduce risks, not act as a tool for anti-development forces to hinder or stop investment. Your consideration is appreciated. Sincerely, Robert B. Robinson

Submission Number: ***MBTL-SEPA-DEIS-0000561***

Received: 5/19/2016 6:06:32 PM
Commenter: Dennis Robinson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Longview is a town built on natural resources and import/export. I believe this project is a perfect fit for our community. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn't like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done!

Submission Number: ***MBTL-SEPA-DEIS-0000838***

Received: 5/24/2016 12:30:19 PM
Commenter: Eben Robinson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. I support Millennium Bulk Terminals site in Cowlitz County. These trains are no different than the coal cars we’ve transported through our state for many decades. In reality, not one ton more of coal will be used globally because of U.S. exports, and the net gain in greenhouse gas emissions is insignificant. If we don’t build these terminals, energy suppliers will just look elsewhere for their supply! Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project. Sincerely, Eben D Robinson erobinson@swenergy.com 85704

Submission Number: ***TRANS-SPOKANE-M2-00025***

Received: 5/26/2016 12:00:00 AM
Commenter: Joella Robinson
Organization: Dr. Ethan Angel, Proxy
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Joella Robinson, but I'm speaking on behalf of Dr. Ethan Angel. As a primary care physician at a local community health center here in Spokane, my primary concerns about the proposed coal trains related to human health and social justice. The damage to human health resulting from this increase in train traffic, particularly trains transporting coal, is not hypothetical or abstract. It is real based in science, and it will be suffered by people all along the rail lines every day.

Diesel exhaust is a known carcinogen, and the particulate from coal dust combined with that from the trains' exhaust will impact lung health. Those with asthma and other chronic lung diseases will be most impacted, potentially fatally.

This is a social justice issue as well because low income and other vulnerable populations are concentrated most closely along the rail lines.

In addition to the chronic daily impact on health there will be catastrophic events that will occur more randomly. Wait times to cross the rails as trains pass will increase dramatically. This will delay emergency vehicles that cross their every day.

Imagine if your loved one were the one on the wrong side of the tracks in this emergency situation. And of course there will be derailments. These will obviously impact more than the passengers on the train, especially considering numerous major population centers and the large rivers carrying drinking water that are crossed by these rail lines.

As this project is projected to provide a small amount of jobs, most of which will be temporary and low wage, then that economic impact of those trains will be detrimental.

This is also a social justice issue since these most vulnerable populations are most impacted by this economic damage, and because human health is intimately connected to economic health. Thank you.

Submission Number: ***TRANS-SPOKANE-M2-00073***

Received: 5/26/2016 12:00:00 AM
Commenter: Joelle Robinson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. I'm Joelle Robinson, and I'm here today as an aunt to my seven nieces and nephews, ages 9 to 20, and for my one-year old God daughter and for all of your sons and daughters.

The actions we take on this coal export proposal directly affect their lives when it comes to climate disruption. A time when the science is clear from the world's leading scientists and from our own lived experience, we can not allow any extreme fossil fuel infrastructure. We cannot allow the largest proposed coal export terminal in North America to be built.

Coal is the dirtiest, most carbon intensive fossil fuel. There is already too much suffering in the world and we want to help turn the tide and reduce the amount of climate impacts, including droughts, devastating forest fires, deadly heat waves, crop failure, and cultures that are being displaced due to sea level rise.

There are already hundreds of thousands of people dying each year due to climate impacts, and numbers of animals going extinct is heart wrenching. We are disrupting our entire window of life, which is unconscionable.

We have a choice here to move forward with clean energy. And with fossil fuel transition policies recently passed in Washington, we're moving backwards.

This project would increase Washington's existing toll of greenhouse gas emissions by 30 percent according to the DEIS. That is unacceptable. As is the increased asthma and cancer that would accompany it. As is the increased toxic air pollution inflicted on our Asian world neighbors. And then back again to the West Coast, contaminating our Northwest rivers, lakes, and fish.

Our children are depending on us. I implore you to take the no action alternative for your children and all our children.

Submission Number: ***MBTL-SEPA-DEIS-0001313***

Received: 5/26/2016 6:57:30 PM
Commenter: Jon Robinson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm glad to have the chance to make a comment about this project as it's very important to me. I support Millennium Bulk Terminals site in Cowlitz County. These trains are no different than the coal cars we've transported through our state for many decades. In reality, not one ton more of coal will be used globally because of U.S. exports, and the net gain in greenhouse gas emissions is insignificant. If we don't build these terminals, energy suppliers will just look elsewhere for their supply! Please, you are an important part of our beautiful country just like we are. Why would you not want to make a better America for hard working American families? There's absolutely no reason to not support this project. Let's build a better tomorrow.....today! Thank you for letting me submit my opinions and show my support for the project.

Submission Number: ***MBTL-SEPA-DEIS-0001510***

Received: 5/31/2016 2:30:51 PM
Commenter: Randy Robinson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As a concerned Wa St Longview resident I am posting this in hopes of giving a realistic opinion of a situation which is developing in this area and I would venture to say in most areas of the U.S. The concerns of some as they travel the world is the visible pollution both aquatic and air born types. Though I am not a world traveler, my knowledge of other countries pollution problems is extremely large human populations in extremely small geographical areas; infrastructures being poorly designed and cobbled together over centuries as needs, technologies, development and funding come, never at the same time and never in the best conditions to produce what populations and economies require. I have live in Virginia, Pennsylvania, Maryland where coal is the main source of energy for industry. American industry is what has made America great. We now are breaking down the very foundation of our greatness by no longer sustaining our industries, local economies and careers of our citizens. If we do not stop this constant humiliating attack on industries we will all be citizens of a un sustained non self sufficient country! Our economy here in the past many decades has supported by the timber industry. The Pacific Northwest is one of the worlds highest producing timber regions. Our citizens and economy took an awful crushing blow from environmental black science(un proven hypothsises) concerning spotted owl and fish habitats. Our very tax base was decimated along with the lives and economy which produced family living wages. Timber is one of this country's renewable resources. An economic treasure which must be harvested and nurtured to benefit the world. Coal is a natural resource high this country has been blessed with in great abundance and should be brought up to continue to benefit all man kind the world over. Those countries which still depend on its existence and availability for their energy should be able to count on us being a constant and stable source. As some are so ignorantly thinking they are doing these populations such a wonderful thing, they actually are hurting the lives and future of them ever rising to be able to convert to other source of energy! The environmental impact of coal distribution in this region is absolutely so minuscule. Yet it's existence and presence here can have extreme positive impacts the world over. Let us share our resourses and wealth with others so all can prosper and be the truly wise stewards mankind was meant to be! It is time to unify our thoughts, abilities, resourses and technologies and keep our country and community strong in all ways. Respectfully submitted, Randy L. Robinson Sincerely, Randy L. Robinson rlrbuilder@gmail.com 98632

RECEIVED
JUN 07 2016

Robert B. Robinson
Box 163
Kingston, ID 83839

June 5, 2016

Millenneum Bulk Terminal EIS
c/o ICF International
710 Second Avenue
Suite 550
Seattle, WA 98104

Dear Sir or Madam:

I am writing in support of the Millennium Bulk Terminal development. The project will be a great benefit to wage-earners in the region. Resource industries and transportation traditionally provide living-wage, non-seasonal employment. These are the kind of good job opportunities that the U.S. needs so much in this time poor job creation. The export sector is a crucial component of the Washington economy.

Modern permitting and regulatory procedures minimize a project's environmental impacts and risks. I have looked over the EIS for the project, and I feel there are adequate safeguards to allow the project to proceed in a beneficial manner. The Cumulative Impacts part of the permitting process seems speculative and far-fetched. I feel like the permitting process is practically designed to make resources-based economic development very difficult or impossible. The permitting process needs to be streamlined in order for valuable projects to be developed with less delay.

An unfortunate situation exists where the 'opposition' to resource projects is organized and can readily mount communication campaigns against project development. On the other hand, the wage-earners who will benefit from development cannot even know who they are at this point, and certainly have no organization comparable to the 'opposition'. The one exception to this may be labor unions acting in favor of development.

In summary, the MBT represents a large investment that will provide much needed, living-wage jobs in the region. The nation suffers from the lack of creation of high-wage jobs in traditional industries, and every job created is valuable. The Washington export economy needs this type of investment to modernize and grow. The EIS process will necessitate development with minimal impact and risk. The EIS process allows anti-development forces unrealistic opportunities to slow or stop needed investment. This opposition is very hard on wage-earners in modern times. The process should improve the environmental aspects of projects and reduce risks, not act as a tool for anti-development forces to hinder or stop investment.

Your consideration is appreciated.

Sincerely,

Bob Robinson

Robert B. Robinson

Submission Number: ***MBTL-SEPA-DEIS-0001365***

Received: 5/26/2016 7:21:18 PM
Commenter: Sharon Robinson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to reach out on this important issue. Raising a family is tough, and this economy is not making it any easier. That's why we need to capitalize on any opportunity that we have to provide good-paying jobs that can support a family. The Millennium Bulk Terminal project will create jobs that can help families give their children the head-start that they need. There are men and women throughout the state that are waiting for the chance to work hard for their families. It simply makes no sense to turn them away at this point. I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life.

Submission Number: ***MBTL-SEPA-DEIS-0000893***

Received: 5/24/2016 4:54:26 PM
Commenter: Cynthia Robinson-Sim
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Here are my comments on the Millennium coal export terminal. I support the project and the jobs and tax revenues it will provide. Media coverage would have us believe that transporting coal by rail through our state is unprecedentedâ €"it’s not. We’ve transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on Millennium’s application.

Submission Number: ***MBTL-SEPA-DEIS-0003413***

Received: 6/14/2016 2:18:30 AM
Commenter: Sandy Robson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I live in Birch Bay, Washington, about a mile and a half from Cherry Point, the proposed location for the Gateway Pacific Terminal. I am one of many here in Whatcom County who have been very active in the fight against GPT for the last five years. Because of that, the proposed Millennium Bulk Terminal at Longview is a project I have followed pretty closely. First, I want to state for the record to the agencies reviewing these comments, that giving the public only 45 days to comment on the Draft EIS for the MBTL project is unfair and unacceptable. The size of the MBTL project, which would handle, store, and ship 44 million metric tons of coal is unprecedented. The Draft EIS contains thousands of pages. Here in the Pacific Northwest, we have been inundated over the last number of years with proposed fossil fuel projects to the point at which it is almost impossible to keep up with studying those proposals in order to comment on those. I would venture to say that our country has never before experienced such a time where such a large number of proposals have been proposed within the last 5 years or so, as is the case here in the Pacific Northwest. Because of this fact alone, for agencies to have given the public only 45 days to comment feels as if my due process has been usurped. I ask that you realize that 45-day comment periods on proposals that are huge in size and scope such as MBTL require a longer comment period, and that you adjust that on any future proposed projects. On May 9, 2016, the USACE denied the permit for the proposed GPT project at Cherry Point based on the adverse impact it would have on the treaty fishing rights of the Lummi people. I am grateful for the diligent efforts of the Lummi Nation in their extensive study of the GPT project, their community outreach, and their dialogue with the federal government. The community in Whatcom County has been celebrating the USACE having upheld Lummi treaty rights and the big step forward in protecting the precious and sacred lands and waters in the Pacific Northwest that sustain all of us. Supporting Native American treaty rights and cultures provides many benefits to our state and to our entire country, as well as the environment that supports life here on earth. Treaties are considered the supreme law of the land, so there is an obligation required of our federal government and its agencies to ensure the protection of those rights. From reviewing the Draft EIS for the MBTL project, it is clear that the decisions made regarding this EIS will have significant direct adverse impacts on the fishing rights and vital cultures of Native American tribes in the Pacific Northwest, as well as the survival of all species of critical importance to human survival. For example, the salmon population in the Columbia River has been declining. Most salmon and steelhead in the Columbia River Basin have been listed under the Endangered Species Act. Knowing this to be true, it seems almost a criminal act for the terminal applicants to build and operate a 44 million ton per year coal export terminal which is likely to wipe out those already endangered species. Please do not permit a project which there is already ample evidence to show the significant adverse impacts to the environment, human health, and the treaty rights and cultures of Native American tribes impacted by the proposed MBTL. Regards, Sandy Robson

Submission Number: ***MBTL-SEPA-DEIS-0003421***

Received: 6/14/2016 2:48:10 AM
Commenter: Sandy Robson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I live in Birch Bay, Washington, about a mile and a half from Cherry Point, the proposed location for the Gateway Pacific Terminal. Because of that, the proposed Millennium Bulk Terminal at Longview (MBTL) is a project I have followed pretty closely. To permit the construction of MBTL when the market for coal is spiraling downward seems like an extremely poor decision for any agency, but even more so, considering the house of cards which presently makes up the ownership of MBTL. Let's look at that ownership from beginning up to present time: Millennium Bulk Terminals-Longview, LLC (formerly Millennium Bulk Logistics) is a subsidiary of Australia-based Ambre Energy that was a majority (62%) partner in the Millennium Bulk Logistics Longview Terminal project (Arch Coal has a 38% interest). In November 2014, Ambre Energy sold its two Rocky Mountain coal mines and its stake in proposed coal export terminals planned for Washington and Oregon to Resource Capital Funds (a Denver, Colorado private equity firm) for $18 million, according to company filings with Australian regulators Resource Capital Funds (RCF) is a long-established investor in Ambre Energy, maintaining a voting position on the company's board, and loaning Ambre approximately $95 million. RCF bought the Decker mine in Montana, and the Black Butte mine in Wyoming, along with Ambre's stake in the Morrow Pacific Project in Oregon and its stake in Millennium Bulk Logistics Longview Terminal in Washington Ambre Energy had purchased Cloud Peak Energy’s 50% interest in Decker mine and related assets in September of 2014, and assumed 100% ownership of Decker Mine. Part of that deal included an option granted to Cloud Peak Energy for up to 7 million metric tonnes per year of throughput capacity at the proposed Millennium Bulk Logistics Longview Terminal, and Ambre Energy's assumption of all reclamation and other Decker liabilities and replacement of Cloud Peak Energy’s $66.7 million in outstanding reclamation and lease bonds Under the deal between RCF and Ambre Energy, RCF would operate under the name Ambre Energy North America, and the leadership team would stay the same. In April 2015, Ambre Energy North America changed its name to Lighthouse Resources Inc. Lighthouse Resources is a privately held company headquartered in Salt Lake City, Utah. Arch Coal which invested $40 million in the proposed MBTL between 2012 and 2014, was forced to file for bankruptcy protection in January 2016. It was reported in May of 2016 that Arch Coal sold its stake in the MBTL project to Lighthouse Resources which will acquire Arch’s 38% stake. No cash changed hands in that deal, and Arch will no longer be held liable for future capital costs and it will receive the option to use up to 10% of the port’s capacity under the terms of the deal. The Casper Star Tribune reported that Millennium is permitted to make funding requests under the terms of its agreement with Arch Coal and Lighthouse Resources. If either company fails to meet those requests it would result in a penalty and result in a dilution of the defaulting company's stake in the MBTL coal port, the Star-Tribune reported. It's important to remember that back in the fall of 2010, Cowlitz County commissioners had approved Millennium’s permit to export between 5 to 6 million tons from the existing dock. Environmental groups appealed to the state review board. Then, in February 2011, internal emails of Ambre Energy officials revealed the company was looking to potentially export as much as 60 million tons of coal per year. After public pressure, Ambre withdrew its permit application, saying it planned to resubmit an application at a future date. Here is a NY Times story about all that: http://mobile.nytimes.com/2011/02/15/us/15coal.html?_r=1&ref=us&referer=http://earthjustice.org/blog/2011-march/longview-coal-export-terminal-application-withdrawn Please do not permit this project as its history has shown us since 2010 up through the present that it has been nothing but a loser project for the people in Cowlitz County and the Pacific Northwest.

Submission Number: ***MBTL-SEPA-DEIS-0001903***

Received: 6/3/2016 6:40:40 PM
Commenter: Clinton Rock
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Wyoming coal is some of the cleanest burning coal available. The mines have employed thousands of workers with the support for the mines and those workers increasing the employment to the tens of thousands. The coal was then shipped to the user who employed thousands more and produced energy in support of millions. Taxes were generated through this entire process in support of several states and their residents. With a few strokes of the pen all this is coming to an end. Miners to dish washers are now out of work and unable to support their families. States are trying to provide with smaller revenue. If we now have a chance to export some of our coal and put some of the miners, RR workers, Etc. back to work it seems to me it should be done. I add my voice to those in favor of developing this site to export coal.

Submission Number: ***MBTL-SEPA-DEIS-0002932***

Received: 6/13/2016 3:18:42 PM
Commenter: Barbara Roderick
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001536***

Received: 5/31/2016 4:53:27 PM
Commenter: Brian Roderick
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. Millennium Bulk Terminals in Longview is offering to create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.

Submission Number: ***MBTL-SEPA-DEIS-0001716***

Received: 6/1/2016 12:44:02 AM
Commenter: Gayle Rodgers
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear WA Dept. of Ecology and Cowlitz County: I support the “no action” alternative in the Millennium Bulk Terminals Draft Environmental Impact Statement (EIS). Millennium’s proposed coal export terminal would harm communities throughout the Northwest, with the most intense impacts felt in Longview, Washington, near the proposed terminal site. The project harms our health and safety, air and water quality, and natural resources. I urge your agencies to protect public health and natural resources. Reject coal export. Very recently the US Army Corps of Engineers denied a permit for development of the Gateway Pacific Terminal coal export facility at Cherry Point in Whatcom County, Washington, citing the treaty protected fishing rights of the Lummi Nation. The Millennium Bulk Terminal should be rejected on the same grounds. Those of us in the Pacific Northwest, Native American or not, are all "Wy-Kan-Ush-Pum", which translates in English to "Salmon People". We revere and honor our salmon and its historical impact on the development and economic growth of our corner of the United States. I was born and raised in Astoria, OR, just downriver from Longview and the proposed Millennium Project and know, first hand, how salmon and all fish were integral in the settlement, growth and development of the Lower Columbia. Processing salmon for, then, Bumble Bee Seafoods' during the late 1960's and early 1970's, in their canneries in both Astoria and Naknek, Alaska financed my college education. The Millennium Project will directly impact and violate the treaty rights of the federally recognized Cowlitz Indian Tribe as well as their close neighbors, the as yet unrecognized Chinook Tribe (Federal petition for recognition "pending). In addition. the member Tribes of the Columbia River Inter-Tribal Fish Commission (the Yakama Nation, Confederated Tribes of the Warm Springs Reservation, the Umatilla Tribe and the Nez Perce Tribe) have all expressed concerns about the impact of a coal export plant downriver from their tribal treaty rights protected fishing areas on the upper Columbia River. We have and will continue to work very hard to protect and restore our environment and the fish populations that have been negatively impacted by degradation of that environment. The historic regional, national and international impact of Federal litigation, including both US v. Washington and US v. Oregon, cases that were decided in favor of the protected treaty rights of NW Native American Tribes, Nations and Peoples by the United States Supreme Court CANNOT BE IGNORED! They are the Law of the Land. Please do the right thing and act in the best interest of ALL "Wy-Kan-Ush-Pum - Salmon People" in Washington and the Pacific Northwest. We have succeeded in protecting our rights via the USACOE decision concerning Cherry Point and we ask you to step up and protect protect another region in Washington State and those sacred rights as concerns approval of the Millennium Bulk Terminal coal export facility in Cowlitz County, WA. Sincerely,

Submission Number: ***TRANS-PASCO-M1-00043***

Received: 6/2/2016 12:00:00 AM
Commenter: Tamir Rodney
Organization:
State: Virginia

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi, Department of Ecology and Cowlitz County. Thank you so much for hosting this. My name is Tamir Rodney (phonetic). I'm a native of Kennewick. I live in Seattle now. I work on climate and clean energy policy for the Washington Environmental Council. And I am strongly urging you to say no to this coal export terminal. I think certainly we have an obligation to future generations not to contribute to global warming. Our state actually has a law that was passed in 2008 that requires statutory limits on carbon emissions. And so, if we're trying to reduce our own carbon here at home, I don't think it makes sense for us to export coal to another place when the amount of carbon that would be emitted by that would be equal to the amount emitted by our own state. And we know that coal is on the decline in the United States thanks to the Clean Air Act amendment signed by President George H.W. Bush. And we know the advent of natural gas fracking technology and renewable energy contributes to the decline of coal here. So this is the sign of the coal companies to ship it out to China but China produces most of the coal it consumes. I think this coal would go to South Korea. But we need to have the globe decrease emissions.

In Paris they signed that deal that said the globe cannot increase emission more than 1.5 degrees Celsius. I don't see how shipping more coal is going to productively contribute to that.

I agree with everybody who is concerned about jobs. I wholeheartedly want jobs, but we can do it through a blue green alliance. We can have stainable jobs. We can invest in rebuilding our crumbling infrastructure. It creates jobs throughout the state than those just created in Longview by creating this one terminal. We don't know about the Powder River Basin that it's going to easily get exported. We know that the Department of Interior is considering social cost of carbon in the royalty rates that it provides for coal.

So thank you for your time and I urge a no.

Submission Number: ***MBTL-SEPA-DEIS-0002304***

Received: 6/9/2016 5:03:06 PM
Commenter: Tracy Roesler
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. This draft EIS is exhaustive; there is nothing further to study. Coal is an abundant commodity that moves freely in a global market. Asian economies consumed over 5 billion tons of coal in 2012 without any exports through Washington ports. Additional supplies to feed that market are coming on line from Australia, Indonesia, South America and Mongolia, and domestic supplies in China are becoming more readily available. Assuming that incrementally new GHG releases will result from some portion, or all, of future coal exports from a new terminal in Longview Washington that, at maximum capacity, would amount to less than 1% of Asian coal use, requires a degree of speculation that is not permissible under SEPA or NEPA. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium’s proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0002622***

Received: 6/13/2016 11:39:05 AM
Commenter: Barbara Rogers
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001549***

Received: 5/31/2016 5:03:46 PM
Commenter: Christie Rogers
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close and move on to a permit decision. This draft EIS is exhaustive and quite frankly, overreaching. For instance, because the proposal is a terminal proposal, the use of the bulk commodity by a third party is a superseding and intervening cause to the combustion of coal. As a result of these superseding causes, the construction and operation of the terminal is not a proximate cause of the combustion of coal. Enough already! The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward.

Submission Number: ***MBTL-SEPA-DEIS-0000421***

Received: 5/17/2016 6:41:24 PM
Commenter: Jan Rogers
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

There's no time like the present to support the draft study as it relates to the port at Longview. We need the economic boost this port will provide and the world needs American coal. The economy depends on trade. It creates jobs working the railroads and ships, loading cargo at the ports, growing crops for export, and building the infrastructure necessary to support a trade-based economy. However, trade depends on permitting approval to construct this infrastructure. If the federal, state, or local government apply different permitting standards to projects exporting coal, they are creating a dangerous precedent that will make it hard to build new infrastructure needed to export other goods, like wheat or manufactured products. The environmental groups have a long history of challenging trade based projects in the northwest, such as Columbia river dredging, new rail facilities and/or export terminals. Governments shouldn’t threaten trade or the jobs that depend on it. Thank you for taking my comment and for providing the opportunity to weigh in. I believe strongly in this project and hope that you will consider the strong commitment Millennium has made to restoring and protecting the environment in our community.

Submission Number: ***MBTL-SEPA-DEIS-0003269***

Received: 6/13/2016 7:23:10 PM
Commenter: Vivana Rojas
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscores my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. Washington has long depended on trade and exports as a vital part of our economy, directly and indirectly creating 40 percent of all our state's jobs. Ushering in developments like Millennium Bulk Terminals - now thoroughly reviewed and vetted - will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0003301***

Received: 6/13/2016 8:09:25 PM
Commenter: Vivana Rojas
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000777***

Received: 5/23/2016 2:19:59 PM
Commenter: Tony Romano
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I've been following this issue, and am glad to have the chance to weigh in. This draft EIS is exhaustive; there is nothing further to study. Coal is an abundant commodity that moves freely in a global market. Asian economies consumed over 5 billion tons of coal in 2012 without any exports through Washington ports. Additional supplies to feed that market are coming on line from Australia, Indonesia, South America and Mongolia, and domestic supplies in China are becoming more readily available. Assuming that incrementally new GHG releases will result from some portion, or all, of future coal exports from a new terminal in Longview Washington that, at maximum capacity, would amount to less than 1% of Asian coal use, requires a degree of speculation that is not permissible under SEPA or NEPA. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***TRANS-SPOKANE-M2-00036***

Received: 5/26/2016 12:00:00 AM
Commenter: Alfredo Romero
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening. My name is Alfredo Romero, and I'm a social worker. And I want to talk about intersectionality. There seems to be a lot of intersectionality related to this terminal: Health-wise, jobs-wise, people-wise, local emergency issues.

But the one thing, you know, that we're failing to recognize is the other intersectionality factor that it's all about money. And it's not about American money. It's not about money in Spokane. It's not about money in the state of Washington. It's about money in China. It's about money in other markets. It's about putting the people of our state at risk for someone else's money.

I don't know, as a social worker we tend not to put value on life. But I think that's what's happening here. I think that we have a group of people that are supporting this based on a pie in the sky promise that it's going to generate a lot of jobs, when in effect what it's going to generate is a lot of jobs in the health care industry but not the kind of jobs that we want.

Jobs that are going to have to be taking care of people with respiratory issues. Jobs that are going to have to be taking care of people that can't get to the hospitals in time because they're held up by a train.

The intersectionality of this issue is a negative one, and I ask you to take no action on this terminal. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002329***

Received: 6/9/2016 5:22:55 PM
Commenter: Angelo Romero
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. This draft EIS is exhaustive; there is nothing further to study. Coal is an abundant commodity that moves freely in a global market. Asian economies consumed over 5 billion tons of coal in 2012 without any exports through Washington ports. Additional supplies to feed that market are coming on line from Australia, Indonesia, South America and Mongolia, and domestic supplies in China are becoming more readily available. Assuming that incrementally new GHG releases will result from some portion, or all, of future coal exports from a new terminal in Longview Washington that, at maximum capacity, would amount to less than 1% of Asian coal use, requires a degree of speculation that is not permissible under SEPA or NEPA. Thank you for reviewing my comments today.

Submission Number: ***TRANS-LV-Q3-00041***

Received: 5/24/2016 12:00:00 AM
Commenter: Deborah Romero
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Deborah Romero, and I'm a business owner and concerned citizen from Portland. In addition to all the countless problems with this project, Millennium Bulk is not even an economically viable project.

As you know, the Australian company Ambre Energy, which was the chief owner of Millennium Bulk, sold its North American operation because they were in debt, out of cash, and unable to raise the capital before they defaulted on their loan to their creditor. And this creditor was a creditor of last resort. Ambre couldn't even attract anyone else to the table to invest in them.

And who is this creditor of last resort? A vulture hedge fund that invests in very high risk deals, and they are the principal owner of Millennium Bulk. This doesn't exactly inspire confidence.

And as we know, the minority owner, Arch Coal, just filed for Chapter 11 bankruptcy. But coal industry bankruptcies are now a dime a dozen. All tolled, nearly 50 U.S. coal mining companies have filed for bankruptcy and more are on the verge.

I used to be a stockbroker and I'm well aware that companies can emerge from Chapter 11 bankruptcy reorganized. But here's the problem. The entire coal industry is falling apart. It's collapsing. And not just here but in Asia.

just released detailed plans in February for how they plan to slash coal consumption. This move will accelerate China's well-documented shift away from coal.

A quick note: Cloud Peak Energy, one of the coal giants of the Powder River Basin has in the last number of years made more money shorting coal than exporting it.

If I were your financial advisor I would counsel each of you to avoid investing in the U.S. postal system if it were a private company. Stay away from print newspapers, big department stores, and for heaven's sakes, don't invest your hard-earned cash in coal projects unless you are going to short them.

I besiege you, don't hitch Longview's wagon to this falling star.

Submission Number: ***MBTL-SEPA-DEIS-0002841***

Received: 6/13/2016 2:43:48 PM
Commenter: Ramona Rommereim
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

We own property in Longview and live in Pasco, WA. The economy of the Longview area has suffered immensely from multiple economic impacts due to government actions. This is an opportunity for the community to recover and thrive again.

Submission Number: ***MBTL-SEPA-DEIS-0001515***

Received: 5/31/2016 4:32:00 PM
Commenter: Frank Romph
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it's the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000370***

Received: 5/15/2016 4:15:18 PM
Commenter: Steven Roos
Organization:
State: Utah

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I am concerned that increase coal transported by train will cause coal dust and it's accompanying metals to contaminate Lake Pend Oreille and would like to see that this is mitigated sufficiently.

Submission Number: ***MBTL-SEPA-DEIS-0000644***

Received: 5/20/2016 1:38:57 PM
Commenter: paula root
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our state is trade dependent and a critical part of the import/export infrastructure of the West coast. International trade is essential to the economy of Washington and supports many family-wage jobs. Cowlitz County has a chronically high unemployment rate. There are environmental impacts of building trades and longshore workers having to travel as far as the Port of Seattle for work on a daily basis, instead of going to a job at Millennium. Let's keep our jobs local! The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000721***

Received: 5/23/2016 1:16:17 PM
Commenter: Carol Rose
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Clearly there will be significant impacts if this marine terminal is built. The number of trains will be great. Even with sprays the coal dust will get into our air and river. Living in Vancouver, every coal train will travel by my home. Between the proposed oil terminal and the proposed coal terminal, the potential for environmental impacts and dangers to our communities is astronomical. Added to these significant potential impacts is the fact that when China burns coal, we get it back as air pollution. I sincerely hope that these significant problems will be taken into consideration and this coal terminal will be denied. A few jobs are definitely not worth the potential dangers to the health and well being of our Washington communities.

Submission Number: ***MBTL-SEPA-DEIS-0003270***

Received: 6/13/2016 7:24:45 PM
Commenter: Chey Rose
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002096***

Received: 6/7/2016 4:58:23 PM
Commenter: Jeffrey Rose
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0002099***

Received: 6/7/2016 4:59:48 PM
Commenter: Jeffrey Rose
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed Millennium Bulk Terminal would provide. The project would create work right away during construction, and plenty more jobs would stay around to run the terminal. Plus, all of those wages generated would trickle back into our local and state economies. At a time when our state unemployment rates are below the national average, we cannot miss big opportunities for new business like this one. Thank you for reviewing my comments today. I actually do support this but don't like the manipulative way this site gets support. Is it really over Native American fishing rights? Come on. It was horrible what happened to them but that was 200 years ago. If it brings in new jobs then it's for us. Enough of the tail wagging the dog. Yes I'm for it.

Submission Number: ***MBTL-SEPA-DEIS-0000932***

Received: 5/24/2016 5:16:39 PM
Commenter: Shelly Rose
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to reach out on this important issue. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. Help increase the economy in the several states that will be impacted with the creation of jobs from this terminal. The coal industry is vital to the world economy! Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays. Please help it to move forward. Sincerely, Shelly Rose shelly.rose@cldpk.com 82718

Submission Number: ***MBTL-SEPA-DEIS-0000930***

Received: 5/24/2016 5:15:45 PM
Commenter: Warren Rosenbaum
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium’s proposal is unprecedented and has far reaching economic implications. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0000525***

Received: 5/19/2016 5:29:09 PM
Commenter: William Rosenbladt
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Despite all the rhetoric to the contrary about coal exports, I firmly believe you can have both good family-wage jobs and be good stewards of the environment. It doesn’t have to be a choice of one over the other. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied â€" get on with it already. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0000647***

Received: 5/20/2016 1:44:05 PM
Commenter: Viola Rosengren
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold's site. They are an important part of our community and economy and will do even more great work once their permits are granted. This is an old industrial property being redeveloped. Keep the review to what is normal and factual.

Submission Number: ***MBTL-SEPA-DEIS-0002988***

Received: 6/13/2016 4:12:30 PM
Commenter: Richard Rosenhaft
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Millennium Bulk Terminals-Longview SEPA Draft Environmental Impact Statement You who have the power to stop this terminal will never have a better time to say no to coal than now. You and I know coal extraction is extremely environmentally destructive. We know that eventually, due to dangerous levels of CO2 and accessibility of alternative energy systems, we will eventually have to leave coal deposits in the ground. Developing the Longview coal terminal and the infrastructure it will require over its lifetime of 20 or more years, will reward some financially, yes, but at the expense of a healthy planet that I and perhaps you, wish to leave for our grandchildren. Would you who have the power to stop this terminal like see your own children or your aging parents live along the route of open coal rail cars? I trust that the answer is no and that you wouldn't want to watch them exposed to daily doses of coal dust and the consequences of acute and chronic respiratory conditions such as asthma and emphysema. We are human and pride ourselves for our empathy and compassion. Will the railroad keep telling us that the tracks are safe? We know that future derailments are likely. What was unusual about the one in Mosier was not its occurrence, but that it did not lead to loss of life. As it was, there was property damage, and interruption of traffic and commerce, as well as environmental degradation. At the Longview terminal, the coal will be kept in open-air stockpiles before transfer to transport vessels. This again exposes the local communities to coal dust. Would you who have the power to stop this choose to live with such increased exposure to dust? We know that controls like water sprayers are ineffective. Once the coal reaches its Asian destination, the coal will be burned by industry and contribute to global climate change by emitting greenhouse gases. Cheap coal will slow our necessary progress in embracing green energy at home and in China. In the meantime, our environment and human health will degrade. Some things are more important than profit. My conclusion, which I hope that you share with me, is that the environmental impact of coal from the time of its extraction to its use by industry is too great to justify building the Longview coal terminal. Richard Rosenhaft

Submission Number: ***MBTL-SEPA-DEIS-0002728***

Received: 6/13/2016 1:48:27 PM
Commenter: Aaron Rosenlund
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

A large part of Wyoming's economy relies on extraction of our natural resources. Constructing this port will allow Wyoming to continue exporting coal, resulting in jobs and general economic growth. Without the port, Wyoming is looking at tough years ahead. The actual port itself has very little, if any, affect on the environment. Hopefully a just and reasonable decision can be made based on facts and not emotions.

Submission Number: ***TRANS-SPOKANE-M2-00019***

Received: 5/26/2016 12:00:00 AM
Commenter: John Roskell
Organization: County Commissioner, Former
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. My name is John Roskell. I'm a former County Commissioner here in Spokane from 1995 to 2004. And I'm going to talk about this regionally, locally, and internationally. So I'll start with locally.

Locally, some of my calls, and a lot of my calls as a County Commissioner were from people who were irritated about the inadequate grade crossings here in Spokane.

If we have 16 more trains, 1.3 miles long, every day coming through here, this is going to be a tremendous gridlock for Spokane and Spokane Valley. We have too many at-grade crossings and BNSF wants to get busy and pay for either to go underneath those tracks or over them, well then it might work.

Regionally, I paddled the Columbia from source to mouth a couple years back, and I didn't start hitting a lot of trains until I got to McNary Dam. But I encourage every one of you to visit Horse Thief park -- or campground in Columbia Plateau Park right across from The Dalles, and you can pick up as much coal along that railroad right there as you want to see and work at.

All of these railroads going through that area are right -- they go through Ballast, right on the river, and it's not a hundred feet from the water, it's right on the water. And all that coal dust is coming of those loads they put surfactant on is going in that water. I can tell you that right now. And you can pick up as much coal as you want.

Internationally, I've been to China many times. I took the train from Beijing down to Zhengzhou, the Sichuan Province. It's a long, long train, and there's nothing but pollution -- coal pollution all along in China.

Once you're out of Beijing -- you know, it's polluted from automobiles, but once you're out of Beijing there's very few regulations on those. So thank you very much.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☑ Air Quality
- ☐ Human Health
- ☑ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☑ Coal Dust
- ☐ Greenhouse Gas
- ☐ Climate Change
- ☐ Plants and Animals
- ☑ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

My name is John Roskelley. I'm a former Spokane County Commissioner (1985-2004). I paddled a kayak the length of the Columbia River and wrote the complete guide to all 1200 miles. From the mouth of the Snake River to Portland, I paddled along the shoreline and every 15-30 minutes a train went by me, some with cars loaded with coal. I didn't realize how much coal dust and even

(additional space is provided on the back)

(comment continued)

chunks of coal blew off the coal cars until I pulled over to the shoreline at Horsethief Park inside Columbia Plateau State Park. Along the tracks and filling the crevasses in the basalt rocks and formations along the tracks was enough coal to turn the surrounding area a grey-black color. Anyone could fill a bucket in just a few minutes. Obviously, the loaves of coal atop the cars are losing a good deal of their loads in the form of coal dust and small clinkers all the way from Montana and Wyoming. This toxic dust is blowing into our waterways, farmland, and private property. Increasing the amount of coal trains to Longview would have increasing effects to our air quality and detrimental to wetlands, creeks, streams, and rivers. It's already having an effect on the Columbia.

Let's not export dirty coal to countries like China that have few, if any, environmental regulations. Will they find it and burn it regardless? Yes, but we have to take our stand and set an example for the rest of the world - burn less coal and find and exploit environmentally green energy.

John Roskelley
10121 E Heron View Ln
Mead, WA 99021
509-954-5653

Submission Number: ***TRANS-LV-M2-00054***

Received: 5/24/2016 12:00:00 AM
Commenter: Erin Ross
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi, there. I'm Erin Ross of Vancouver, British Columbia, and I am very excited to speak to you about what it is like to grow up next to a coal exporting facility. I grew up in Tsawwassen two kilometers from the largest coal facility on the northwest coast of North America. It exports 32 million tons of coal per year, much of that from the Powder River Basin.

As a kid I would watch my dad as he washed the coal dust off our cars. And that task is more and more frequent. When my parents moved to Tsawwassen in the late 1980s, you could catch crab and cook them right up on the Tsawwassen beach. Now if you pull up crab from the water surrounding West Shore Terminals, the shell will contain massive amounts of coal dust.

And the fish at Roberts Bay have coal residue in their gills. I'm concerned that the DEIS states that there are not adverse impacts on aquatic ecosystems and fish populations. I urge you to consider the real health impacts that coal exports has on communities.

Something that is near and dear to me are the pulmonary health issue associated with coal exports because I am a congenital heart patient. I went straight to the emergency room and was monitored extensively until I had heart surgery when I was five. Communities need -- deserve the facts about health impacts on coal projects, on the health of communities and children.

I am also worried about the health of workers. I've dedicated the last three years of my life to stopping a new coal port from being built in my home community, alongside organizers, workers at West Shore. A man named Dennis was working in a coal pile a few months ago when it combusted and gone up in flames. He's never going to go back to work because the carbon monoxide poisoning he's experienced. That was not his idea of a good job. Please don't make the same mistakes as BC and adopt the no action alternative.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002550***

Received: 6/12/2016 3:47:30 PM
Commenter: Paula Rotondi
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County, The Draft Environmental Impact Statement (DEIS) fails to address this highly likely, significant and serious impact of the Millennium Bulk Terminals proposal – coal trains create safety hazards for all trains travelling on those same tracks. In a 2011 lawsuit about the cause of train derailments1, BNSF testified that the train derailments were caused by coal dust from coal trains. BNSF testified that its own studies proved that coal dust from coal trains, “destabilizes rail bed ballast”, “interferes with track stability”, and “when combined with water from extraordinary amounts of precipitation weakens the rail bed and causes track failure”. When Millennium Bulk Terminals was first proposed, highly explosive Bakken crude oil was not transported by train through Washington State but at the present time more than 19 trains per week carry crude oil through Washington State. Millennium’s 16 (8 full/8 empty) daily coal trains would use the exact same track as the crude oil and chemical trains heading to Washington State’s existing refineries and industrial facilities. Millennium’s coal trains would increase the risks of railroad track failure for all trains traveling the same tracks. Millennium’s coal trains would increase the risks of a catastrophic crude oil or chemical train derailment/spill/explosion. The DEIS does not assess nor address the risks coal trains pose to the safe transport of trains carrying highly explosive crude oil or other hazardous chemicals. In consideration of this concern, I urge you to take the “no action” alternative in the Millennium Bulk Terminals DEIS and reject this coal export proposal. Sincerely, Paula Rotondi 1. 2011 EB SURFACE TRANSPORTATION BOARD DECISION Docket No. FD 35305 ARKANSAS ELECTRIC COOPERATIVE CORPORATION-PETITION FOR DECLARATORY ORDER http://1.usa.gov/XWiWT2

Submission Number: ***MBTL-SEPA-DEIS-0002553***

Received: 6/12/2016 4:41:56 PM
Commenter: Paula Rotondi
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County, The Draft Environmental Impact Statement (DEIS) fails to acknowledge the highly likely, significant and serious impacts of the proposed Millennium Bulk Terminals uncovered coal stockpiles. I ask that the DEIS be revised to include the following specific concerns regarding Millennium's uncovered coal stockpiles: Millennium's uncovered coal stockpiles would emit approximately three million pounds of coal dust annually. 1, 2 Millennium's uncovered coal stockpiles would be less than 1000' from the Columbia River. This coal dust would pollute the air and water for as far as the wind blows and the Columbia River flows. The virtually constant release of coal dust from Millennium's uncovered coal stockpiles would be an ongoing, serious and significant source of toxic air pollution for all persons particularly employees working at Millennium and at nearby facilities. Equally concerning is that the virtually constant release of coal dust from these uncovered coal stockpiles would be an ongoing, serious and significant source of toxic air and water pollution harming all wildlife and vegetation exposed to it 3,4,5. Chillingly, the DEIS indicates that coal dust from the terminal can be mitigated by a "reporting process" for coal dust complaints. By including such an insolent mitigation measure the DEIS writers display ethical incompetence and undermine the credibility and integrity of the entire DEIS. Please revise the DEIS to remove inadequate, unsupported and unenforceable mitigation measures. A fatal asthma attack is not mitigated by sending an email or making a phone call. The fact that the DEIS is devoid of any mitigation to meaningfully reduce the release of fugitive coal dust confirms that there is no way to prevent hazardous amounts of coal dust from escaping a 75 acre uncovered coal stockpile holding 1.5 million metric tons of coal. Although the effort to clean-up the heavily contaminated project site is a step forward, permitting Millennium to contaminate the exact same site would take two giant senseless steps backwards. In consideration of these concerns I urge you to take the "no action" alternative in the Millennium Bulk Terminals Draft Environmental Impact Statement (EIS). Sincerely, Paula Rotondi 1. Douglas L. Cope and Kamal K. Bhattacharyya, A Study of Fugitive Coal Dust Emissions in Canada, "Chapter 8: Coal Terminals: Fugitive Dust Emissions and Control," prepared for The Canadian Council of Ministers of the Environment, November 2001. 2. Section 1, The Proposed Gateway Pacific Terminal (GPT) Facts and Impacts, written by Save Birch Bay available at Whatcom County Libraries and on the Whatcom County Planning and Development Services website http://www.co.whatcom.wa.us/pds/plan/current/gpt-ssa/pdf/save-birch-bay-gpt-info-20141001.pdf 3. Sharma PK, Singh G. 1991. Distribution of suspended particulate matter with trace element composition and apportionment with possible sources in Raniganj coalfield India. Environmental Monitoring and Assessment 22:237 - 244. 4. Karagianes MT, Palmer RF, Busch RH 1981. The effects of inhaled diesel emissions and coal dust in rats. American Industrial Hygiene Journal. Volume 42(5):382 – 391 5. NOAA Technical Memorandum NMFS-NWFSC-85 U.S. DEPARTMENT OF COMMERCE National Oceanic and Atmospheric Administration National Marine Fisheries Service Community Profiles for West Coast and North Pacific Fisheries

Submission Number: ***MBTL-SEPA-DEIS-0002554***

Received: 6/12/2016 5:03:38 PM
Commenter: Paula Rotondi
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County: The Draft Environmental Statement (DEIS) fails to include clearly delineated fiscal responsibility for the costs associated with any and all environmental damages, clean-up costs and damages to individual and to the public's health and safety resulting from all aspects of this project. The DEIS should be revised to include a fiscal responsibility plan designating that the specific corporations that produce the coal and the specific corporations that load and transport the coal are responsible for fully reimbursing every public agency, business, non-profit organization, and private individual who participates in contamination clean-up response, and/or who is harmed or inconvenienced by this project from initial approval through complete clean-up of the site after cessation of operations. The corporations must obtain and show proof of bonds sufficient to cover the full extent of all these costs. The bonds must be from an independent insurance agency/entity with holdings certified and guaranteed to fully cover and dedicated to specific coal production and transport for specified date ranges. The coal producing, loading and transporting corporations should not be allowed to "self-bond" especially amongst themselves or with affiliated or financially linked corporations. To a large extent, a financial responsibility plan could be designed by "reverse engineering" the financial responsibility plan established and implemented after the BP Deepwater Horizon oil spill that devastated ecosystems and lives of the Gulf Coast. The DEIS should be revised to include a mitigation measure requiring the establishment of a website so that when Millennium Bulk Terminals operations cause harm, public agencies, businesses, non-profits, volunteers and injured individuals can immediately log in to the site and submit records for their time, costs, and damages. We must end the practices that allow the corporations that profit from fossil fuel production and transportation to saddle the public and individual victims with the environmental and health costs caused by these corporations. In many cases these corporations (and their executives) pay no taxes - either because of their special tax loopholes or tax code manipulations. These corporations will only truly commit to protecting the public and the environment when they cannot escape paying for the full financial consequences of their actions. In consideration of the fact that the DEIS fails to address fiscal mitigation measures for highly likely, significant and serious adverse impacts of the Millennial Bulk Terminals project, I urge you to take the "no action" alternative in the Millennium Bulk Terminals Draft Environmental Impact Statement (EIS). Please reject the Millennium Bulk Terminals coal export proposal. Sincerely, Paula Rotondi

Submission Number: ***MBTL-SEPA-DEIS-0002556***

Received: 6/12/2016 5:08:49 PM
Commenter: Paula Rotondi
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County, If the Millennium Bulk Terminals had been proposed forty years ago, it may have seemed like a forward-looking, business growth project. But this is not 1976 and in the past forty years we have learned a lot and a lot has changed. We have learned that coal causes serious, significant wide-spread health problems; coal pollutes what our lives depend upon - air, land and water. We've learned that coal is the single worst fuel source contributing to global climate change. And we've learned that there is no Asian market for Powder River Basin coal. The Draft Environmental Impact Statement (DEIS) contains significant information that is out-of-date and now known to be false, e.g. the Asian market for U.S. coal is gone and isn't coming back. The DEIS completely fails to address significant impacts, e.g. fugitive coal dust from uncovered coal stockpiles, and the described mitigation measures are incapable of adequately reducing the project's significant serious risks to the public's health and safety and to the environment. So on this day in 2016 as you consider permitting for the Millennium Bulk Terminals, I urge you to take the "no action" alternative in the DEIS and reject this outdated coal export proposal. Sincerely, Paula Rotondi

Submission Number: ***MBTL-SEPA-DEIS-0000590***

Received: 5/19/2016 6:34:24 PM
Commenter: Bob Roush
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The draft environmental study for Millennium Bulk Terminals coal export facility was sufficient. Please move forward. There are many benefits of the project that the community is waiting for. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). The draft EIS to evaluate Millennium Bulk Terminals proposed Longview project should be kept within reason. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with the process in a timely manner. It's the fair thing to do.

Submission Number: ***MBTL-SEPA-DEIS-0001427***

Received: 5/27/2016 1:14:29 PM
Commenter: Elaina Rowland
Organization:
State: Arizona

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
NO TO COAL!!!!!!!!!! What is wrong with you people? Are you just going to keep on until you destroy the earth and everything on it? What good is money going to to do you then? It is time to protect and preserve this beautiful home of ours!!!!!!

Submission Number: ***MBTL-SEPA-DEIS-0001432***

Received: 5/28/2016 2:48:58 AM
Commenter: Elaina Rowland
Organization:
State: Arizona

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
NO TO COAL!!!!!!!!!! What is wrong with you people? Are you just going to keep on until you destroy the earth and everything on it? What good is money going to to do you then? It is time to protect and preserve this beautiful home of ours!!!!!!

Submission Number: ***MBTL-SEPA-DEIS-0001067***

Received: 5/24/2016 6:51:23 PM
Commenter: Jeff Rowley
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the opportunity to add my voice to that of others in supporting the environmental study for the proposed port at Longview. The DEIS will present a clear picture of how Millennium Bulk Terminals will proceed in opening and operating this port and the economic, environmental, and social benefits of this project are deserving of approval. In regards to coal dust & human health impacts: Please refer to the American Lung Association's report on state / county rankings. First please note that the incidence of pediatric and adult asthma for Cowlitz Co is 9.1%, Clark Co. is 9.0%, and Yakima Co is 8.9%. Then compare this same statistic to communities where coal is produced or shipped through such as Campbell Co WY at 9.0%, Box Butte Co, NE (Alliance) 6.96%, Lincoln Co NE (North Platte) 6.98%, or St. Louis Co MO 7.68%. Further, the ALA ranking for 24 hr particulate matter in Campbell Co WY scores a grade of B, as compared to Clark Co WA at F and Yakima Co WA at F. The evidence is obvious, coal production and transportation is not causing a health problem, but it can act as a remedy to an economic downturn. Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done!

Submission Number: ***MBTL-SEPA-DEIS-0003278***

Received: 6/13/2016 7:36:01 PM
Commenter: Hailey Roy
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Royce, Karen (0100)

Submission Number: ***MBTL-SEPA-DEIS-0000100***

Received: 5/5/2016 9:37:59 PM
Commenter: Karen Royce
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to reach out on this important issue. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied â€" get on with it already. The draft EIS to evaluate Millennium Bulk Terminals proposed Longview project should be kept within reason. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with the process in a timely manner. It's the fair thing to do. Sincerely, Karen Royce kkuperr@aol.com 77019

Royce, Karen (0995)

Submission Number: ***MBTL-SEPA-DEIS-0000995***

Received: 5/24/2016 5:55:40 PM
Commenter: Karen Royce
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Moving this project forward is important to me, my family and my community. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it’s time to move forward. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0003182***

Received: 6/13/2016 6:20:46 PM
Commenter: Karen Royce
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close and move on to a permit decision. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn't have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. Thanks again to the agencies for allowing public comment on this important proposal. It should continue to go forward with much enthusiasm. Sincerely, Karen Royce Kkuperr@aol.com 77019

Submission Number: ***MBTL-SEPA-DEIS-0000081***

Received: 5/5/2016 9:18:48 PM
Commenter: rt5t3
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. GHG from the use of coal and nationwide rail capacity should not have been included in this study, but now that they’ve been included and thoroughly studied â€" it’s time to move this proposal forward! Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project. Sincerely, rt5t3

Submission Number: ***MBTL-SEPA-DEIS-0001197***

Received: 5/26/2016 10:35:35 AM
Commenter: Steven Rubenstein
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am a tree-hugging hypocrite. I understand and appreciate that workers in Cowlitz County want jobs. I disagree with the scoping requirement to consider the climate change issue given that coal will be burned regardless of whether this terminal is built. I do not care about diesel exchaust from trains -- trains are legal and are already running on the tracks anyway. I do not care about at-grade crossing -- communities have known about this for years yet have never done anything about it. That is a problem that can be solved with money, although I believe the railroads should be required to fund a larger percentage of these than is currently required by federal law. But I strenuously disagree with the "conclusion" that coal dust is not an issue. It is a huge issue from both the trains and the terminal itself. Coal trains spew a huge amount of coal dust, which has never been eliminated and cannot be mitigated. The coal companies complain that they cannot cover their loads -- a state requirement for all other transportation -- because of the concerns about spontaneous combustion. But their "Elmers Glue" covering clearly does not work. At the coal terminal, huge amounts of water are used to "control" coal dust. But at every coal terminal, huge amounts of coal dust are blown by the wind into the water and onto surrounding communities. Grain export terminals do not just dump grain on the ground and hope it does not get blown away. Oil export terminals do not store crude or refined gasoline in open-air pools. No other exports industry dumps their product in the open, waiting for the wind to take it away. If Millenium could transport coal from Wyoming to its final destination without burdening every community along the route with toxic coal dust, then I would be ok with the terminal -- despite my feelings about coal in general. But they either cannot or will not. I am sure which it truly is, but either way, the result is the same -- toxic coal dust that is illegally polluting our air, land and waterways.

Submission Number: ***MBTL-SEPA-DEIS-0000914***

Received: 5/24/2016 5:09:23 PM
Commenter: Jack Ruch
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State's role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. I'm certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

Submission Number: ***MBTL-SEPA-DEIS-0000959***

Received: 5/24/2016 5:34:23 PM
Commenter: David Ruff
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. It is important that the public have the ability to comment on projects of this nature as the affects will last for years to come. Thank you for the opportunity to comment and please see that this project is worthy and should be allowed progress forward and develop.

Submission Number: ***MBTL-SEPA-DEIS-0001542***

Received: 5/31/2016 4:58:52 PM
Commenter: Jacqueline Ruffin
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the agencies offering this opportunity to comment on Millennium Bulk Terminals DEIS. The port at Longview will bring many good paying jobs to Washington and will encourage the development of our natural resources nationwide, helping to lift us out of our current nationwide economic depression. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let's be clear, the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0002794***

Received: 6/13/2016 2:25:14 PM
Commenter: Aaron Rugh
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003020***

Received: 6/13/2016 4:39:56 PM
Commenter: Aaron Rugh
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001187***

Received: 5/25/2016 9:19:17 PM
Commenter: Hallie Rugheimer
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello SEPA-EIS personnel, Here is an update from Montana you should know: Otter Creek coal plans have been abandoned,Arch Coal recently abandoned plans to strip mine Otter Creek coal because of plummeting market and a suit filed by conservation groups and the Sierra Club on grounds that the RMPs violate the Nat.Environ. Policy Act by failing to seriously examine the effects of the policy on the land, water and air especially as it effects the changing climate in a devastating way. Divesting by businesses, individuals in fact nations recently in fossil fuels is a sign of the future. We do not need the last of the marine terminals constructed to ship coal to Asian countries. Please consider not to allow this MBTL to be build in Cowlitz, WA. Thank you considering my comments for this SEPA EIS.

Submission Number: ***MBTL-SEPA-DEIS-0003188***

Received: 6/13/2016 6:24:02 PM
Commenter: Javier Ruiz
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you. Sincerely, Javier Ruiz ruiz.pasco@gmail.com 99301

Submission Number: ***MBTL-SEPA-DEIS-0003283***

Received: 6/13/2016 7:41:33 PM
Commenter: Roman Ruiz
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Steve Running: Yes, I want to particularly point out what I see happening in the global coal markets and global carbon cycle science. That's the stage that I work in, global carbon cycles. We, probably a decade ago, first identified really clearly that the biggest single carbon emission by humanity is burning coal for electric power. It became clear to us right at that point that everything else we do in trying to reduce carbon emissions wasn't going to matter at all if we didn't, first and highest priority, quit burning coal for electric power.

That was over a decade ago. It didn't seem like we were making much progress until about the last year. I can finally say that we've had a pretty good year in global policies. Obviously we all know about the Paris Climate Agreement where every nation signed on to a commitment for driving down carbon emissions, and for most countries that first biggest carbon emission is burning coal for electric power.

What's more immediately relevant to us here is that China not only signed the Paris Agreement, but China actually does a 5-year strategic plan for the nation. What a concept to actually plan the future of your nation. We've got learn something here. In the last 5-year plan, China has publicly announced that they will quit importing coal. What we're clearly seeing is that in 2014 and 2015, China's coal imports went down by actual statistics, so they're making good on this strategic plan that they've announced.

They are starting to drive down their purchasing of imported coal. Of course, their 2 biggest sources are Australia and us. They have already announced that they have a strategic objective to quit buying coal. I can't imagine a worse time for America to be building more coal infrastructure when the biggest customer has already announced publicly that they're going to quit buying. This is really almost a no-brainer.

What I also see now in this last year is that the world financial community has really started to catch on that long-term fossil fuel investment, and particularly long-term coal infrastructure investment, is just plain a bad idea. It's a bad investment. You have very high probability of losing your investment with the trajectory of the global economy and energy. When the world bank and Goldman Sachs, I read almost every week another major financial institution announcing that they are getting out of coal investment ... What we see here is the local version of that same decision point.

You would think this ought to be an easy decision, that the last thing the Pacific Northwest would want to do is invest in long-term infrastructure for coal export when a major customer has already announced that they're going to be capping their imports. I think this is to me, at the global scale that I work at and study and follow, this really should be a pretty easy decision then. This is certainly not a terminal that we want locally, but that even makes any sense in terms of a larger financial picture. It just doesn't make sense one bit. I think that's what I want to leave with you on this topic. Thank you.

Paul Smith: I'm really happy to get a chance to comment on the health implications of the increasing coal shipments by rail for our communities and others. It's easy to make the case that negative health impacts with coal will occur because they've been occurring for the last several hundred years. There's no reason to think a little bit more is better.

I hope to stress the health threats local to Missoula and also stress that this new threat will be greatest on the vulnerable, including children, infants, the unborn, and the elderly. I also have a list of references that I always feel nervous talking and making statements without. If anybody wants the list of the references that at least give the health implications, please see me. Because I take care of children and infants with lung disease, obviously my main concern at the local level is the increase in air pollution from these diesel fumes, coal dust, and worsening climate change.

Data is substantial showing that coal trains do increase bloom concentrations. Diesel emissions are recognized as carcinogens, which was previously noted, and contain toxic substances such as polyaromatic hydrocarbons and particulate matter or PM. Coal dust also adds to air pollution in the form of particulate matter. Of the 6 criteria of air pollutants that the EPA is mandated to regulate, particulate matter is perhaps one of the easiest to track and to correlate with health effects.

It's generated a vast amount of medical literature. We know there is PM increase as public health worsens. We also know that when we lower particulate matter, population health improves. That's an important concept and lends significant credibility to particulate matter being culpable, and justifies action that lowers air pollution. Particulate matter leads to lung damage and diseases such as asthma and COPD. Children are at the highest risk because their lungs are developing and they have more life years of exposure.

This often worsens over decades from accumulating scar tissue along the airways by repeated injury. We have no cure for asthma. For today's living asthmatic children, they may end up being tomorrow's asthmatic cripples. In health, particulate matter also leads to diseases distant from the lungs such as heart disease, stroke, and cancer and even adverse effects on pregnancies and fetal tissue. Infants born to a mother exposed to high concentrations of particulate matter are born smaller, and with impaired lung function.

These more systemic effects outside of the lung happen in part because fine particulate matter can also cross pulmonary system directly into the circulation and they release whatever poisons they contain. Missoula already struggles with air quality in a large part because of our valley inversions that attract pollutants. Despite strong efforts to decrease particulate matter, we often, here in Missoula, are close to the prescribed threshold by the EPA for particulate matter.

There is no safe lower threshold. The more time one spends in high exposure of particulate matter, the greater the effects. Again, this is of special concern to children. Another health concern with coal dust is increased chance of train derailments. You might recall an article in the Missoulian last year quoting the Department of Transportation estimating that there would be over 10 derailments per year in the US of trains carrying nothing but ethanol and oil cargo alone. Missoula is a very populated area. It's time we realize that with only 2 hospitals in our town, we would struggle to handle the type of derailment disaster that hit Quebec killing 47 and devastating a small

town.

Then finally the effects of coal combustion on climate change are already significant here in Montana. As it was noted, we've already come through 2 of the warmest years on records and the warmest April on record. Our snow pack is already lower than normal this year and it's disappearing. Our farmers and ranchers are threatened. Increased forest fires and hot weather will again threaten our health and our children's health.

By way of closing, one of my favorite quotes when giving a talk like this is from CF Elliot in 1909. He was then secretary of Anaconda Copper Mining Company. He stated, "We have the perfect right to carry on a legitimate business and if incidentally we should pollute the atmosphere nobody has the right to complain until specific damage gives them a cause of action." This statement really describes the position that we're in as a company.

We can't stop a process legally until we can show harm. By then, the ground, the air, and the water are contaminated, and our children are sick and it's too late. So ask yourself when we're coming through these discussions what angles are we heading in? Is the public being shouldered with the responsibility to prove harm or is the impetus on the industry to prove there's no harm? Harm to health has already been shown. There is specific cause for us to halt more pollution.

John: Good evening. I'm John Woodland. I retired in January as the Superior, Montana Fire Chief. I'm speaking from my background in emergency services, I do speak for myself. Superior is one of the many small towns along the rail line that this project will negatively impact. Emergency services and access to many of my district's neighborhoods require crossing the tracks. That's true of many other towns along the rail line. This is what's hauling our water supply across the tracks.

I personally waited at a grate crossing for a train to pass while on an emergency service response. This proposal lacked the train traffic. It increased the likelihood emergency services will be negatively impacted in communities all along the tracks. The tracks in Mineral County in places are built right along steep mountainsides next to the Clark Fork of the Columbia River. Trains fall off these tracks sometimes into the river and not that infrequently.

In my 10 years as the fire chief there have been 2 trains in the river in Mineral County. One visible from my home, included empty oil cars, and the other dumped Boeing fuselages into the Albertan Gorge. More traffic means more wrecks. More traffic will also mean more pressure not to hold up the trains for maintenance work which means yet again more wrecks. For Montana, Eastern Washington and Idaho, it also means less access and higher prices to ship agricultural products. For emergency services, today the 800-pound gorilla in the room is climate change.

If you don't think that's emergency service issue just look at the newspaper for the last week, at the evacuation of between 80 and 90,000 people from Ft. McMurray in May in

Northern Alberta, months before there's supposed to be a fire season in that part of the country. This is the future for the entire inter-mountain west if we don't act decisively now with climate change. We cannot continue to invest in fossil fuel projects, such as Longview, and have any chance of limiting the worst impacts of climate change. I urge you to say to no to the Longview Coal Port and yes to acting decisively on climate change now before it's too late.

Michael: My name is Michael Daniel Bolt. I'm a student at the University of Montana. I'm running for House District 98, Montana State District. I think preventing any new coal mining is the best choice. I'm also interested in bringing ideas of increasing government control over the natural resource industry including the coal industry. I believe government run operations of the coal industry would allow us to shut down that industry more responsibly and make any future natural resources extraction use projects really more beneficial to the Montana people. That's the main concession. That's all. Thank you.

Carolyn: Hello, my name is Carolyn Walker. I used to be Carolyn Alderson. I lived along the Tongue River for 20 years of my life. I raised my 3 children there. There is an interesting story about a law and a regulation that actually stopped something. When I lived down there, the Northern Plains Resource Council, I was part of it, was just beginning. That's when you all heard of the Tongue River Railroad. The Tongue River Railroad was thought of and started because there was a mining plan for that area, right on the Tongue River. It was called the Montco Mine.

Well there's a nice picture of me shaking hands with President Carter in 1977 at the signing of the strip mining bill. In that bill there's a piece of the legislation that says, "There shall be no strip mining on Alluvial Valley Floors." The Montco Mine was right on the Tongue River. It caused some difficulty in the community. I just wanted you to know that there are ways to use legislation and rules to stop bad things from happening. My recommendation is that we recommend no action on the Longview Port.

Jim: My name is Jim Parker. I live in Missoula Montana. As a Montanan along the rail corridor between the Powder River Basin mines and the proposed terminal I oppose the Millennium Bulk Terminals because of the associated increase in coal train traffic through my community. The increased coal train traffic will bring with it increased air pollution and health risks from increased coal dust and diesel exhaust and increased noise pollution.

In addition, the increase in coal traffic through my community will reduce access across the tracks and cause traffic delays for citizens, commuters, for emergency response vehicles when there's a medical emergency or fire, or a need for police. The additional train traffic will also provide greater potential for vehicle collisions with trains and for pedestrian accidents.

As a Missoulian and Montanan, I'm asking that the EIS fully analyze and consider the impacts of this port and the increased coal train traffic would cause here in Missoula and across Montana especially as it relates to the above sited impacts. The proposed project’s impacts are real and significant to Montanans and are connected in cumulative

result of what happens if this project is approved.

The EIS prepared by the court in the Washington Department of Ecology in Cowlitz County must include all the connected and cumulative impacts in Montana that will result if the MBTL facilities are approved and constructed. These include the significant connected and cumulative impacts on the project all the way back through Montana to the Power River Basin Coal Mines in Montana and Wyoming.

The increased rail traffic in Montana must be addressed, analyzed, and its consequences fully considered in the EIS. More trains in Montana will mean an increase in the amount of airborne pollutants, from diesel engines as well as from coal dust. Medical studies have shown a clear link between both diesel air pollutants and coal dust and disease.

While those with chronic disease, the elderly, young children, and pregnant women are most at risk, the health effects from particulate matter exposure may occur years later. Even healthy individuals need to be concerned. These issues must be addressed, analyzed, and their consequences fully considered in the EIS. The MBTL facility will directly lead to an increase in the burning of coal. The link between increased coal burning and associated public health problems cannot be ignored and should be included, analyzed, and the consequences fully considered in the EIS.

Finally, because the sole purpose of the MBTL facility is to facilitate the shipping of coal being transported from the PRB to its final destination in Asia, where it will be burned for energy, I also believe that the EIS must fully consider the long term and direct effects that this action will have on the global climate.

In conclusion, I strongly oppose the proposed Millennium Bulk Terminals Longview facility. The connected and cumulative impacts to Missoula, and all of Montana, from the proposed facility, are real and significant. The EIS prepared by the co-lead ggencies for this project must address, analyze, and consider all the connected and cumulative impacts this proposal will have on Montana. Please reject this proposal and take no action.

Thank you.

Harold: I'm Harold Hoem from Missoula. The whole town of Butte Montana went through a long period of horrible air quality early in this century because of ore smelting. Read a book called Smoke Wars. People sickened and then died especially underground miners like my grandfather who was cut down in the prime of life by lung disease. The corporate giants called the air pollution a nuisance. It was deadly. Oh, what a nuisance Biff was to my family.

What are some corporations proposing to do this century later but ship Montana coal overseas so citizens there can get sick and die from nuisance called coal? A friend of mine who was a former coal mine manager says this, "The problem with the coal mining industry is the product is a poison”. We know that CO2 is increasing dramatically. It is now over 400 parts per million. Humanity hasn't seen this stuff but it is affecting climate

change dramatically.

The current wildfire in Ft. McMurray in Alberta Canada caused the evacuation of over 88,000 people. The smoke from each building is hundreds of miles away. Perhaps a wake-up call for Montana. We have rapidly declining snow pack and are facing longer and harder, tired, and more dangerous fire seasons and possibly worse than Iroquois. For sure a nuisance for residents and a real downer for tourism. The DEIS gives Montana a scant potential.

They say 16 additional coal trains a day would go through Missoula that cite inflated numbers for existing traffic of 25 to 28 trains. We currently see only 13 to 15 trains. 16 more trains would double current traffic. The effects would ripple down all the impacts of safety risks, derailments, noise, dust, the laser crossings et cetera. They should know where our current capacity is and give assurances that deficiencies will be mitigated. My last word , bring down CO2 emissions by switching to renewables. Vote no action. Show the US means business in climate litigation.

Gary: I'd first like to thank Northern Plains and the Hoems in particular for it, and Les Anderson coming all the way from Longview to speak here. The speakers, it's been a very nice haven. Thanks for this opportunity to comment. Hi there, I'm Gary Mattson. I live in West Riverside, which is a suburb of Milltown. I really seriously, if the most serious effects of this port certainly have to do with health and climate change.

For those reasons, I am just baffled that so many people either ignore the science, or deny the science, or simply don't know about the science. I cannot understand why we have so many people that are not supportive of recognizing climate change demand. Some of the effects aren't realized. I can see in my community. Milltown has one singal entrance to it across on the south side of Powder River, there is one railroad crossing.

If that railroad crossing was blocked, no emergency services can occur. Our fire chief manager will recognize that concern. In Missoula County that's 10. That has a significant impact. The additional of 16 trains would really be a big impact on emergency services. For multiple reasons, I would strongly recommend that no action alternative.

George: Thank you, thank you all for being here. My name is George Price. I was asked to represent an organization I belong to named Indian People's Action. Indian People's Action asked me to be here as an environmental issues coordinator.

I would like to put our input collectively in here; just the fact the basis what coal is doing to our climate and the life on earth. I think that should be enough reason to keep it in the ground, not transport it anywhere. Anybody who's paying attention and looking at how fast this is escalating climate change to an unpredictable level at levels with all the other elements that are being released. Rising sea levels, you can go down the whole list if anybody's honest about that, you would say yes, let's stop all of this.

I'd also like to say let's look at the paradigm shift and deeply question a society that creates incentives for people to write environmental impact statements that are

intentionally lying to the people for profit, for money in a society that lives for money. I'm not going to go into my whole historian's diatribe there. I had often wondered what if the people who came from across the ocean, and likeminded people that welcomed innovation in Massachusetts had come to learn instead of to control. It's great. Can we start on the right foot now? I recommend the no action on behalf of Indian People's Action of Montana.

Dave: Hi, my name is Dave Dittloff. I'm the regional representative for National Wildlife Federation. Most of you are probably aware of National Wildlife Group. We're the folks who put on Ranger Rick Magazine. That's our biggest identifier here with the kids.

In 3, 4 years that that's going to take, yet there's nothing coming back up the streams in order to spawn salmon. The impacts are almost certainly down to relating to some of the impacts here. Last year, last summer's conditions literally had most of the species dying, most of the adults coming back to the rivers and streams here to the headwaters of the Columbia River Basin died due to high temperatures, directly related to climate change.

I want to talk a little about, quickly here's something that hasn't been hit hard today, talk about wildlife. It starts right from the beginning. You look at the mine site here, the direct habitat displacement, the coal recommendation that follows it, that impacts wildlife. If you look at what happens on the mine sites with water, that impacts fish and wildlife. The next connector we look at has it transferred over? We look at the trains. There's been a lot of talk about human health and consequences here which are really important. Those same impacts are related to wildlife for particularly the fisheries here. That coal dust gets in the streams. There's mercury concern with it here and other neurological issues are a concern.

Mercury is bad for people eating the fish as well. We've got dozens of streams and multiple dozens of lakes in Montana that had mercury consumption warnings here. You can only eat so much of the fish. That's an impact to wildlife. You look at the ports, same thing here. The direct construction of the ports, this place is habitat for sure. That has real consequences to the fisheries. You'll see salmon come in and out of the ocean as well here.

Lastly, climate change, I got to talk to you about salmon. Name a critter, even the biggest critters, white tail deer, elk, etc. that think generalist that those are for generalist. There's impacts here. More and more research that's done it's really impact of Montana's out pour heritage, it's culture, what we like to do here whether it's sightseeing, hunting, fishing, what have you here. Fishing is a multi-billion dollar industry in Montana and the Pacific Northwest. There's economic reasons associated with wildlife as well here. I appreciate it. No action alternative makes sense for wildlife.

Dave Jones: Hello, my name is David Jones. I've been a fly fishing guide in Montana for over 30 years. Dave just inspired me to get up here and talk about what I see in my career fishery that I work primarily in. My season has been shortened by an average of about 6 weeks in the 30 years I've been doing this. We don't have clients in August anymore at all because of

the low flows. Half the time our rivers are shut down because we have to worry about railing over there. Anybody that watches the forester around in the spruce moss and the beetle kill, it's just obvious that Montana is being really affected. We mentioned the economic impact, but really we're talking genocidal, ecocidal impacts for climate change. We ought to think in those terms really. This is an emergency. I recommend no action on the terminal. Thank you.

Steve: Hi, my name is Steve Schwartz. I live here in Missoula. I'm a professor interior of the Department of Communication Studies at the University of Montana. I teach and do research in environmental communication. No matter what the coal industry says about the free market, their goal is to get government on their side to make the market work for them whether it's supporting carbon cash receipt frustration, whether it's blocking the clean power plan, or supporting coal export infrastructure like MBT as a goal. It's past time for us to use our voice to remind government agencies who's side they need to be on and who's interest they need to represent.

The connected and key note we've heard about tonight on public health and safety, on air, land, and water, on wildlife, and on climate change are common in house. They're shared by the residents of the Pacific Northwest, shared in common by the people who live in Washington and Idaho and here in Montana. We all deserve a voice in this decision. For that reason, I want to thank all the organizations that have made this opportunity possible for so many of us to express our voices. To protect the commentators in the Department of Ecology, to take no action, thank you.

Jim: My name is Jim Roach. I've been a Missoula resident for 45 years. I don't understand why it's draft Environmental Impact Statement doesn't address impacts for rail traffic in Montana. That seems sort of ridiculous. It seems like a rip off. On behalf of my family, and my friends, and a lot of people that I know are neighbors, I just want to say we don't want any more coal dust. We don't want any more diesel fumes. We don't want any more threat of derailment. We don't want traffic complications from increased rail traffic. We don't want the noise.

Most of all we don't want the climate impact. We don't want the endless smoky summers. We don't want the low stream flows and the sick fish. We don't want the reduced fishing opportunities. We don't want increased beetle kill. We don't want disappearing biodiversity. We don't want damage to agriculture. We don't want the drought. We don't want climate refugees. We don't want shut downs of skiing areas. We don't want this action, no action. Thank you.

Claudia: My name is Claudia Narcisco. I am speaking for myself today. When I was trying to find some things that I was going to speak about, I found an old letter that I had written in I guess November 2013. There goes my letter. I had it on my phone and mailed it to myself. Anyway, it was hard enough to read. I emphasized that connection actions between the mine and the port and Asia and the impacts on climate change and how it would cycle back to us.

I requested that they consider this. I cited a section of the National Environmental Policy

Act. I believe it was section F2 or 2F that specifically directed agencies to consider international ramifications of actions which is not something that we normally associate with, but it's just that it was our responsibility to do that. Obviously those things were not necessarily done, as far as I could tell, to this point.

I hope that's considered.

Submission Number: ***MBTL-SEPA-DEIS-0002801***

Received: 6/13/2016 2:29:51 PM
Commenter: Michael Rush
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0003023***

Received: 6/13/2016 4:41:46 PM
Commenter: Michael Rush
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0002796***

Received: 6/13/2016 2:27:08 PM
Commenter: Tracy Rush
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003021***

Received: 6/13/2016 4:40:46 PM
Commenter: Tracy Rush
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0002846***

Received: 6/13/2016 2:46:04 PM
Commenter: Ed Rushing
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003378***

Received: 6/13/2016 11:42:27 PM
Commenter: Dennis Russell
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I live and work around coal production and transportation every day. In my experience I have not seen evidence that coal harms the environment. In fact, it seems to be one of the least harmful ways energy can be transported. Oil and gas pipelines and power lines disturb hundreds of acres, crude oil can easily contaminate if spilled. Coal will be transported on existing rails to existing ports. In fact if coal is spilled it is a solid that does not soak into the ground and it can easily be cleaned up. Coal is also treated with chemicals that greatly reduce the amount of dust during transportation. Constructing a port to allow the exportation of coal will create jobs and true wealth. The mines, rail roads, ports, shipping, and support companies will all benefit. The result more jobs and wealth. In my opinion, there are many benefits, and few drawbacks or dangers from shipping coal if it is done responsibly.

Submission Number: ***MBTL-SEPA-DEIS-0003147***

Received: 6/13/2016 6:04:47 PM
Commenter: Holly Russell
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. Please move forward now that the draft EIS is complete. It will create jobs and support free market growth. The media would have us believe that transporting coal by rail will destroy the environment. We've transported coal through our country for many decades without adverse affect. I see coal trains almost everyday, and there is no dust or pollution coming from them. The objections about coal dust are coming from environmentalists speaking on personal conviction rather than scientific and observable facts. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. The growing worldwide trade market needs an accessible and dependable low sulfur coal. Please move forward with the permitting process.

Submission Number: ***MBTL-SEPA-DEIS-0000465***

Received: 5/17/2016 7:35:49 PM
Commenter: Jason Russell
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. Media coverage would have us believe that transporting coal by rail through our state is unprecedentedâ€"it's not. We've transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward.

Submission Number: ***TRANS-LV-Q1-00066***

Received: 5/24/2016 12:00:00 AM
Commenter: Tadine Ruth
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Tadine Ruth, and I live in Vancouver. The glaciers retreated 11,000 a years ago and ushered in what geologists call the Holocene epoch. This stable warm climate made agriculture possible and laid out the basis for the rise and spread of human civilization. Since the 1960s, scientists have been concerned that human activities were disrupting not just the local environment but the whole world. Fundamental changes are now occurring in the entire system. Their magnitude and rate of change are unprecedented. The defining feature of the Holocene no longer exist. A new geological epoch has begun, the anthropos from the Greek word for human being. This stage in Earth's history when human activity is transforming the entire planet in unprecedented and dangerous ways. To build any new infrastructure for the fossil fuel economy is beyond folly. It is contributing to suicide. That Montana and Wyoming coal must stay in the ground.

Submission Number: ***TRANS-SPOKANE-Q2-00009***

Received: 5/26/2016 12:00:00 AM
Commenter: James Rutherford
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is James Allen Rutherford. I live at 1520 West Indiana, Spokane, Washington. And I'm really concerned about the state of our overall environment and the idea that the powers that be are more invested in maintaining a profit than taking care of the environment.

I've worked most of my life as what I like to call a, Psychic environmentalist, working with drug and alcohol treatment and seeing the result of too many toxins in the biosphere of one individual after another. And what I'm seeing in the overall environment from the polar caps melting, to the glaciers going away, to the record temperatures last month and this month probably, I think we need to change yesterday. Unfortunately, we can't do it yesterday, but we need to do it now.

Submission Number: ***TRANS-SPOKANE-M2-00077***

Received: 5/26/2016 12:00:00 AM
Commenter: Jim Rutherford
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening. My name is Jim Rutherford. I've been a resident of Spokane since about 1969. I was actually born in Longview.

In those days they had the paper mill down there that you could smell 30 miles away. And part of my concern with this whole situation right now is that I've worked in drug and alcohol treatment most of my career, over 30 years. And what I see happening is a lot like an addiction to a bad drug.

We have polluted the earth to a point where it's just not recovering well. And we may have hit a tipping point. Build a kit in the 350.org. There's been talk about Co2 in the atmosphere.

And last year we hit records that have never been seen before. In a hundred thousand years of going back and looking at climate and Co2 in the environment, they never seen anything like it.

And my concern is partially that we've hit a tipping point and we may not be able to recover, period. So I'm definitely saying, please do not allow this to happen. We need clean energy, we need more jobs. Let them be in something that's not killing the planet, please.

Submission Number: ***MBTL-SEPA-DEIS-0000293***

Received: 5/10/2016 7:13:36 PM
Commenter: Christopher Ryan
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Despite all the rhetoric to the contrary about coal exports, I firmly believe you can have both good family-wage jobs and be good stewards of the environment. It doesn't have to be a choice of one over the other. When the trains are loaded in Montana, Millennium puts a liquid cover like a glue on top of the cars. This eliminates a lot of the coal dust that would normally come off of train cars. Millennium is building this world class export facility right! Remember what matters and keep the focus local! I urge you not to be swayed by outside fanatics who do not care about our county or our people. The environmental review process for Millennium Bulk Terminals should be held to the same standard as every other port or infrastructure project. We have a very fair and comprehensive process in place, and I question the motives of those who say otherwise. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0000389***

Received: 5/17/2016 1:05:18 PM
Commenter: Michael Ryan
Organization:
State: California

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
As an ardent supporter of renewable energy and a clean healthy environment, I strongly urge that this export terminal be stopped.

Submission Number: ***MBTL-SEPA-DEIS-0000973***

Received: 5/24/2016 5:42:54 PM
Commenter: Douglas Ryland
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Despite all the rhetoric to the contrary about coal exports, I firmly believe you can have both good family-wage jobs and be good stewards of the environment. It doesn’t have to be a choice of one over the other. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let’s be clear â€" the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project â€" without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. Thank you for letting me submit my opinions and show my support for the project.

Submission Number: ***MBTL-SEPA-DEIS-0000276***

Received: 5/10/2016 6:38:58 PM
Commenter: Robert Rynish
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Department of Ecology should speedily complete the permitting for Millennium Bulk Terminals. Media coverage would have us believe that transporting coal by rail through our state is unprecedented it’s not. We’ve transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. I applaud the agencies work on this permit process. The results will provide a more-than thorough "hard look" at the possible impacts of the Millennium Project in Longview which is needed to keep things moving ahead. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001631***

Received: 5/31/2016 6:04:26 PM
Commenter: Ronald Sager
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. Washington is highly dependent on trade, and Cowlitz County desperately needs family wage jobs. An EIS that includes newly-invented forms of navel gazing should not have been necessary for a transportation infrastructure project that will facilitate foreign trade and create good jobs for our community. We need this project to move forward without further delays or unprecedented permit conditions. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0002108***

Received: 6/7/2016 5:06:49 PM
Commenter: Ronald Sager
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on the DEIS of the proposed Cowlitz County coal export terminal. This is an excellent project and one that will bring broad-ranging economic benefits to Washington and to the national economic outlook for years to come. Millennium has helped clean up the old Reynolds facility and the Columbia River. The old industrial site had degraded water quality and fish habitats on the river. Millennium has completely turned this around. Millennium has demonstrated a commitment to do everything in its power to contribute to the well-being of the community and local environment. If you ask people in Longview what they think of Millennium, they will tell you they are a good neighbor, good employer and responsible steward of our environment. Thank you for taking my comment and for providing the opportunity to weigh in. I believe strongly in this project and hope that you will consider the strong commitment Millennium has made to restoring and protecting the environment in our community.

Submission Number: ***MBTL-SEPA-DEIS-0002286***

Received: 6/9/2016 4:52:39 PM
Commenter: Natasha Sailer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000066***

Received: 5/3/2016 3:58:22 PM
Commenter: Elizabeth Salinas
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***TRANS-LV-Q1-00004***

Received: 5/24/2016 12:00:00 AM
Commenter: Margo Salisbury
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Hello, my name is Margo Salisbury. I am a retired women's health care nurse practitioner. I worked for 37 years for Multnomah County Health Department in Portland, Oregon. Over the course of my career, I saw over 15,000 pregnant women. I am here to recommend that coal not be transported by railcar through the Pacific Northwest, that Millennium Bulk Terminals not be allowed to build a coal terminal in Longview, Washington so that coal from this port cannot be incinerated in India, Taiwan, and Japan. There are many reasons why I am making these recommendations, but I want to focus on mercury poisoning today. My colleagues will focus on numerous other reasons. Mercury is a heavy metal and can cause adverse health problems even in small amounts of exposure. Mercury poisoning results from drinking contaminated water, inhaling contaminated air, or eating food contaminated with mercury. Mercury is found in the coal dust blown from the uncovered railcars that will be used to transport the coal to Longview. The topping agents used to control this are ineffective over long distances. This coal dust containing mercury will end up in the soil, water, and air. The second source of mercury in our environment will come in the form of blow back air pollution from the combustion of this coal in Asia. Mercury is a potent neurotoxin. It is ranked third in a priority list of 275 hazardous substances by the Agency for Toxic Substances and Disease Registry in 2011. Mercury concentrates in fetal blood as it crosses the placenta from mother to baby. Pregnancy is a critical time for the development of the baby's brain. Mercury disrupts brain development resulting in smaller brain volume, poor visual recognition, IQ decline, decreased vocabulary, and memory. Low birth weight is also associated with mercury exposure. When I was working, I used to warn my pregnant patients not to eat tuna fish because of mercury contamination. You can stop eating tuna fish, but you can't stop breathing. Thank you for this opportunity to share my concerns.

Submission Number: ***MBTL-SEPA-DEIS-0002001***

Received: 6/6/2016 2:50:08 PM
Commenter: Patricia Salvo
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on the DEIS of the proposed Cowlitz County coal export terminal. This is an excellent project and one that will bring broad-ranging economic benefits to Washington and to the national economic outlook for years to come. In Longview, 56% of kids need free and reduced price lunch at schools and go home to neighborhoods facing 8% unemployment. We cannot afford to look the other way when projects in this area guarantee new jobs and private investment in our schools, roads, and local services. In fact, the estimated number of jobs related to construction activity at the Millennium Bulk Terminals project is 1,350 temporary direct jobs - that will mean $70 million in direct wages! When the project is completed there will be about 135 direct jobs and about 165 indirect jobs. These numbers simply cannot be ignored. Remember this project's economic benefits to the local community. Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Submission Number: ***MBTL-SEPA-DEIS-0001258***

Received: 5/26/2016 6:23:46 PM
Commenter: Kyle Samagaio
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on Millennium’s application.

Submission Number: ***MBTL-SEPA-DEIS-0002295***

Received: 6/9/2016 4:57:42 PM
Commenter: Michael Sample
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the opportunity to add my voice to that of others in supporting the environmental study for the proposed port at Longview. The DEIS will present a clear picture of how Millennium Bulk Terminals will proceed in opening and operating this port and the economic, environmental, and social benefits of this project are deserving of approval. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! I appreciate you considering this feedback

Submission Number: ***MBTL-SEPA-DEIS-0001531***

Received: 5/31/2016 4:50:44 PM
Commenter: Kacy Samples
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State's role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Submission Number: ***MBTL-SEPA-DEIS-0000594***

Received: 5/19/2016 6:49:30 PM
Commenter: Lee Samsel
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. Please commit to a timetable for the issuance of a final EIS. Ecology’s SEPA Rules require a final EIS to be issued as close as possible

Submission Number: ***MBTL-SEPA-DEIS-0001755***

Received: 6/2/2016 2:29:55 PM
Commenter: Aaron Sandaker
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I live within sight of the Millennium location and am totally opposed to it for many reasons. The impact of the coal trains blocking intersections and expecting taxpayers to pay for upgrades to the transportation system. The environmental impact of mining the coal then selling it to Communist China so we can get the air pollution blown back here is crazy. Also Millennium talks cleanup of the site which is required regardless of this deal. The handful of permanent jobs is not worth it. What about cleaning up the waterfront to pre industrial condition and opening it up for waterfront restuarants and shops. Or turning it into a riverfront park available to the public. That would be much more appealing than the black-eye this project would give to Longview. Please think long term on this and deny this project.

Submission Number: ***TRANS-LV-Q1-00001***

Received: 5/24/2016 12:00:00 AM
Commenter: Gloria Sanders
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Gloria Sanders. I was born and raised in Longview, and I don't want to see a coal terminal here. We have so many wonderful things in this town to draw tourists, and if we make it a coal town, there won't be any point in trying to draw tourism because nobody wants to come look at a big pile of coal, and we need the tourism. And I just do not want -- I know they say there's no dust, but I've seen pictures of the town up in Canada where they have coal. I've seen pictures of the houses that are within a mile of the coal terminal. Everything is covered in coal dust, and I don't believe there is any way that they can possibly bring in coal, unload it, reload it, and get out of here on the river without some coal dust, so no terminal.

Submission Number: ***MBTL-SEPA-DEIS-0003074***

Received: 6/13/2016 5:16:50 PM
Commenter: Steven Sanders
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001602***

Received: 5/31/2016 5:39:34 PM
Commenter: Bob Sandidge
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to reach out on this important issue. Cowlitz County continues to have a high unemployment rate. We need these jobs and we've paid a high cost with this drawn out permitting process so far. It's time to stop the delay and bring about development and economic relief. Thank you for your work to move forward with this project.

Submission Number: ***MBTL-SEPA-DEIS-0003246***

Received: 6/13/2016 7:08:47 PM
Commenter: Adrian Sandoval
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscores my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. Washington has long depended on trade and exports as a vital part of our economy, directly and indirectly creating 40 percent of all our state's jobs. Ushering in developments like Millennium Bulk Terminals - now thoroughly reviewed and vetted - will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0003315***

Received: 6/13/2016 8:27:26 PM
Commenter: Adrian Sandoval
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003248***

Received: 6/13/2016 7:09:47 PM
Commenter: Angie Sandoval
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscores my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. Washington has long depended on trade and exports as a vital part of our economy, directly and indirectly creating 40 percent of all our state's jobs. Ushering in developments like Millennium Bulk Terminals - now thoroughly reviewed and vetted - will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0003314***

Received: 6/13/2016 8:26:11 PM
Commenter: Angie Sandoval
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscores my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. Washington has long depended on trade and exports as avital part of our economy, directly and indirectly creating 40 percent of all our state's jobs. Ushering in developments like Millennium Bulk Terminals - now thoroughly reviewed and vetted - will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0002195***

Received: 6/7/2016 7:12:56 PM
Commenter: Sandra
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State's role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium's proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0000156***

Received: 5/9/2016 1:35:21 PM
Commenter: Andrew Sandstrom
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

This is an opportunity for Longview to boost its local economy and have a great impact on not only the rural area in which it is located, but also the state of WA. The trickle effect is enormous in the sense that it will also have a positive impact on the states that help produce the coal that is shipped to the countries that need our abundant, affordable energy resource. I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. This is truly a great opportunity for Longview, Cowlitz County, and the state of Washington.

Submission Number: ***MBTL-SEPA-DEIS-0002651***

Received: 6/13/2016 12:19:28 PM
Commenter: Elizabeth Sanford
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000343***

Received: 5/11/2016 3:04:42 AM
Commenter: SHAWN SANT
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and wan to underscore my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing market, thereby spurring greater investments at home. Washington has long depended on trade and exports as vital part of our economy, directly and indirectly creating nearly 40 percent of all of our stat's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Sargeant, Helen (3721)

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☑ Noise
- ☑ Air Quality
- ☑ Human Health
- ☑ Rail Transportation
- ☑ Vessel Transportation
- ☑ Vehicle Transportation
- ☑ Coal Dust
- ☑ Greenhouse Gas
- ☑ Climate Change
- ☐ Plants and Animals
- ☑ Marine Species, Fish, or Fisheries
- ☑ Wetlands or Streams
- ☑ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

Millenium Bulk Terminals - Longview is a dirty, dangerous, antiquated project. Draft EIS finds the coal export project will harm the health and economic vitality of Longview and other communities along the train tracks. There is no mention in the DEIS of any minor mitigation possible for the effects of coal dust, derailment, increased train traffic, air pollution, noise, harmful impacts on tribal culture and

(additional space is provided on the back)

(comment continued)

treaty fishing rights, and vehicle delay at railroad crossing.

Local rail infrastructure in Longview can't handle the additional coal trains – who would pay for upgrades? The DEIS masks impacts of vehicle wait time for trains. Noise would exceed regulatory standards at many Longview homes, disproportionately impacting people of color and low income communities. The problem of coal dust is not addressed. The DEIS ignores significant economic and reputational risks to Longview and other communities impacted by coal trains and dust. Real estate values decline in "coal towns"

The DEIS ignores the economic impacts on other users of the rail system, such as agriculture. Rail system capacity would be exceeded in Washington, Idaho and Montana. Who would pay for and bear the consequences of increased train accidents? There is inadequate study of the risk of massive vessels transiting the Columbia River. The coal terminal would reduce access for tribal fishers and harm salmon habitat. Coal dust lost from open rail cars has not been dealt with. Train and vessel traffic would far exceed what can be safely managed all along the systems.

Exporting coal abroad would make climate change worse, increasing Washington state's greenhouse gas emissions by around 30%.

Economically, the project is a failure considering: coal demand abroad is declining, the federal government is considering overhaul of the federal leasing program.

Choose "no action" alternative.

Plan for health and vitality for all.

Helen M. Sargeant

Submission Number: ***MBTL-SEPA-DEIS-0000611***

Received: 5/19/2016 7:06:30 PM
Commenter: Frederick Sargent
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly support the project and the thousands of jobs this project will create. Ultimately, global warming and the impact of fossil fuels on the environment are national government and international government issues and did not need to be studied in this DEIS. Now that it's done, let's move on to the final EIS! The agencies are doing a great job of evaluating Millennium Bulk Terminals port proposal. I am convinced that this project's permit should move forward without further delay.

Submission Number: ***MBTL-SEPA-DEIS-0003203***

Received: 6/13/2016 6:30:57 PM
Commenter: Cindy Sarles
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close and move on to a permit decision. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. Thank you for your work to move forward with this project. Sincerely, Cindy Sarles cindys@precorp.coop 82718

Submission Number: ***TRANS-SPOKANE-Q1-00011***

Received: 5/26/2016 12:00:00 AM
Commenter: Shane Sater
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Shane Sater and I live near Sandpoint, Idaho. The draft environmental impact statement for the Millenium Bulk Terminals proposal completely ignores the grave consequences increased traffic would have on me, my community, and all the other cities, towns, and residences outside of Washington State. From extra train noise, diesel exhaust, and coal dust I'd have to deal with as I ride my bicycle into town, to the ambulance delayed by coal trains that might not reach the stroke victim in time, to the baby woken in the night by 125 more coal cars shaking the house.

This terminal is a bad idea for Sandpoint and dozens of other railside communities in Idaho, Montana, and beyond. An employer of thieves could claim job creation as a benefit of their enterprise. Likewise, the 135 full-time jobs this terminal would create would come at great costs.

Millenium proposes to diminish our quality of life, to rob our communities of quiet and safety, and to steal from my peers and my children-to-be the hope of lives unencumbered by out-of-control climate change. We can have family-wage jobs without jeopardizing families across the globe.

The draft EIS didn't consider the impacts of mercury pollution outside of Washington State, yet it acknowledges that atmospheric mercury contamination is a global problem. Are contaminated fish and children with learning disabilities unimportant if they're outside the borders of Washington?

This proposal and its implications are a global concern and they deserve global consideration.

Thanks.

Submission Number: ***TRANS-LV-M1-00008***

Received: 5/24/2016 12:00:00 AM
Commenter: Brad Sauer
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Hello. My name is Brad Sauer. I ranch near Forsyth, Montana on the Rosebud Kirk drainage. It's between Linear (phonetic) and Colstrip. And two minutes are just not long enough to address 40 years of negative impacts from the mining and the burning of coal in our area, to our lands and waters, our communities, and our ranches, which have sustainably conducted business for 110-plus years, and could do so for another hundred years conceivably if the impacts are minimized or just flat go away. I'm only one person, I only represent one job here, but I'm of the one percent of family agricultural operators that feed the rest of you and part of the world. I can't work if you can't eat. Our ranch has operated viably since 1989. You may have eaten some beef that I raised. Another hundred years, like I said, are conceivable. But we've lived with negative impacts from coal mining and coal burning and tried to help mitigate them for over 40 years. I'm the second generation person working on this. Additional coal mining, which this port would support, would impact our water. The coal seeps into our groundwater, that they're the main source for water for our stock and our livelihoods. You can imagine what can happen without the water. Additional mining will impact our region, our region's ground water. In February 2016, the Billings Gazette had an article from the USGS Report about how mineable coal in the Powder River Basin will only last four more years at the current rate of extraction. Why are we going to send it somewhere else? Thank you.

Submission Number: ***TRANS-LV-Q3-00023***

Received: 5/24/2016 12:00:00 AM
Commenter: Brad Sauer
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Brad Sauer, and it's spelled B-R-A-D, S-A-U-E-R, and I live at 4472 Highway 39, Forsyth, F-O-R-S-Y-T-H, Montana 59327.

What I wish to convey is that we had coal mines and new railroads planned going through this environmental review process in my neighborhood. I also live near Colstrip, Montana, and there's existing mines and coal-fired power plants there. We've been impacted by them negatively for over 40 -- almost 40 years.

In the consideration of the new mines and the new railroad, the Outerkirk Mine and the Tongue River Railroad, we asked for consideration in the down track impacts because the market for that coal was Asia coming here to these ports that are being considered.

We are keenly aware that we don't operate in a vacuum, we don't live in a vacuum. The impacts that would occur there would be spread here by more rail traffic.

And my point in saying all this is that while the Washington Department of Ecology has done an excellent job of analysis in their EIS of almost every conceivable impact, it stops at the state line.

However, I just described other impacts that will be coming should these mines go through to the state.

So, the opening of the port here would cause additional impacts where I live to land and water and business and communities, financial, social, and in other ways.

The point is that the cumulative effects are larger than just this state. And I'm not aware of a document that considers the larger cumulative impacts.

I would ask the Washington Department of Ecology to expand their horizons literally and consider what their decision will do to the communities and the land and the water where I live, the businesses.

Submission Number: ***MBTL-SEPA-DEIS-0002326***

Received: 6/9/2016 5:20:45 PM
Commenter: David Saueressig
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My family is from the Longview area, my grandparents raised my father there, he left the area due to limited jobs. Our economy and our families are suffering. We can do something about this by supporting the proposed port at Longview that will put people to work quickly and will keep them gainfully employed for years to come. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on Millennium’s application.

Comments on the Millennium Bulk Terminal Proposal Draft EIS

Please accept my testimony on the on the draft EIS for the Millennium Bulk Terminal proposal. My interest is two-fold. I served on a City Club of Portland research study, "Air Quality Regulation in the Portland Metropolitan Area" for 14 months.[1] As a research committee member I studied the adverse health effects of air toxics emitted by industrial processes, the use of chemical agents and combustion engines. In addition my qualifications include 33 years professional experience as an academic researcher in energy conversion and diesel combustion.

Secondly, I am an active recreationalist who, for example during the last year, hiked eight days in the Columbia Gorge and kayaked eleven days on the Lower Columbia River. During these visits to the Columbia River and Gorge I have experienced reduced visibility, waiting for long freight trains at railroad crossings, the noise of freight trains and air toxic emissions from diesel locomotives. I have learned from the communications to members of the Columbia Riverkeeper, Friends of the Columbia Gorge, the Oregon Ocean Paddling Society and Portland Audubon Society of their concerns with the deleterious effects of the proposed coal terminal project in Longview, WA.

The primary air quality health issues with the proposed Millennium Bulk Terminal are due to coal dust emitted from railway coal cars and loading operations and emissions from diesel locomotives travelling through the Columbia Gorge or on a northern route to Longview. It is estimated that at full capacity this project will add about 3,000 round trip coal car train trips per year. Each uncovered coal car may lose more than 500 lb. of coal dust per trip from Idaho to Longview; thus resulting in 400 tons per day of coal dust emitted to the environment from the proposed coal trains to this terminal. The effectiveness of the proposed mitigating open coal rail car spraying operations should be based upon measurements of full scale tests performed under actual transport conditions including a range of weather conditions. Detailed plans for coal car spraying including concentration, duration, frequency, location of spraying stations should be provided.

Using the above travel frequency estimates the coal train locomotive engines are calculated to contribute 200 Tons/year of $PM_{2.5}$ (fine particulate matter 2.5µ diameter or less which easily penetrates human lungs.) To provide a perspective the 2008 DEQ Portland Area Diesel $PM_{2.5}$ Inventory predicts 37.46 Tons/year from rail sources. The annual sum of rail contributions from the proposed Millennium Bulk Terminal Project is equivalent to 25% of the DEQ Portland Area Diesel $PM_{2.5}$ Inventory from all sources. These projections raise a huge red flag warning of the potential of the proposed project to affect air quality and health along the train routes in Oregon and Washington.

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[1] City Club of Portland Bulletin, Vol. 95, No. 35, April 26, 2013.

It is particularly important for WDE to require the applicant to submit a detailed air quality analysis. The analysis should include estimates of the effects of coal dust emitted from rail cars considering the effectiveness and toxicity of mitigating spray operations and particulate, CO and NOx emissions from diesel locomotives, emissions from the loading operations, and the contribution to Washington ambient air from the combustion products of the exported coal burned in Asia and returned to Washington back across the Pacific Ocean by natural atmospheric processes.

Aside from the air quality aspects at issue here increased coal train traffic will cause congestion at rail crossings and increase the possibility of derailments such as the recent one in Mosier, OR leading to water contamination by toxic metals, polyaromatic HC's from spilled coal and possible fires. The applicant should address the coal train safety issues and emergency recovery operations. Residents of the Northwestern United States can expect increased intercontinental air pollution from combustion of the large amount of coal exported to Asia.

In my opinion the coal dust emitted from the coal rail cars enroute and due to unloading/loading operations in Longview is a serious enough problem by itself to preclude approval of the proposed Millennium Bulk Terminal Project by the Washington Department of Ecology. Air toxic emissions from the increased diesel locomotive operations through populous areas of Washington is also a serious issue. The adverse health effects of coal dust are well known and documented. An economic analysis accounting for incurred healthcare costs, time lost from sickness, increased maintenance costs to local communities, local infrastructure investments required for the project, forgiven property tax revenues and delays due to increased train frequency would greatly outweigh benefits from new jobs.

C. William Savery, Ph.D.
Mechanical Engineering Professor Emeritus
Portland State University

June 9, 2016

Submission Number: ***MBTL-SEPA-DEIS-0000544***

Received: 5/19/2016 5:47:09 PM
Commenter: Andrew Savoy
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. In regards to coal dust & human health impacts: Please refer to the American Lung Association's report on state / county rankings. First please note that the incidence of pediatric and adult asthma for Cowlitz Co is 9.1%, Clark Co. is 9.0%, and Yakima Co is 8.9%. Then compare this same statistic to communities where coal is produced or shipped through such as Campbell Co WY at 9.0%, Box Butte Co, NE (Alliance) 6.96%, Lincoln Co NE (North Platte) 6.98%, or St. Louis Co MO 7.68%. Further, the ALA ranking for 24 hr particulate matter in Campbell Co WY scores a grade of B, as compared to Clark Co WA at F and Yakima Co WA at F. The evidence is obvious, coal production and transportation is not causing a health problem, but it can act as a remedy to an economic downturn. It is important that regulatory agencies keep the playing field level by being fair and consistent. The permitting process for this coal export terminal should be similar to other export terminals.

Submission Number: ***MBTL-SEPA-DEIS-0002043***

Received: 6/6/2016 6:17:42 PM
Commenter: Grant Sawyer
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I worked in Longview from 1982 to 2009 and lived there for six of those years. The rest of the time I worked there I lived in Cowlitz County. While working I often ran the 3 1/2 miles running trail around the lake in the center of town. Having run there for many I developed asthma, which is no surprise in that Longview has had the highest asthma rates in the State of Washington. I am concerned that this EIS does not adequately evaluate and provide mitigation for the great increase in coal dust and diesel fumes which will surely become airborne in the area. This must be evaluated and mitigated with the best known science which has not been done up to now. Please protect the health of the citizens of Longview and all of Cowlitz County by rejecting this project.

Submission Number: ***TRANS-LV-M2-00106***

Received: 5/24/2016 12:00:00 AM
Commenter: Grant Sawyer
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello, my name is Grant Sawyer (phonetic) of Portland, Oregon. As a former 26-year resident of Cowlitz County, I worked here in Longview for most of those years. As an energy conservation advisor in the electric utility industry, I learned that the biggest environmental issue facing the industry was the burning of coal to generate electricity.

This burning of coal is the biggest man cause contribution to climate change, which much of the world is already experiencing. While working in Longview, I would often jog the three-and-a-half mile running path right here in the middle of Longview at Lake Sacajawea.

Largely because of that activity I developed asthma, which should not come as a surprise as historically Longview has the highest asthma rate in all of Washington state. Now my question is why would you want to build a mammoth coal export terminal here in Cowlitz County which would contribute to air pollution from the coal dust coming off the open rail cars and diesel exhaust from the multiple trains needed to transport to the coal terminal?

Coal dust and diesel exhaust both are known health hazards, which would be added to an already severely compromised air shed in the community. This DEIS does not adequately address this not insignificant health issue.

And on the economic front this coal export facility is in fact a serious threat to the many existing family-wage jobs that have supported this community for 100 years. And sooner than later with a more impacted air shed, regulators will have to impose stricter air pollution controls on all industries in the area to protect the health of all residents.

Let's protect the existing family-wage jobs that were already here and deny the construction of this proposed toxic monitor. Please select the no action alternative.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001478***

Received: 5/31/2016 10:57:28 AM
Commenter: Bradford Saxe
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I oppose the Millennium Bulk Terminals proposed for Longview, WA. The existence of this terminal not only perpetuates our reliance on antiquated fossil fuels and contributes to climate change but it also poses a significant health and safety hazard to those of us that live along the coal train shipping lines. Dust and pieces of coal fly out of open cars into our air and into the Columbia RIver adding to the already excessive amounts of toxins that infiltrate our lives and the ecosystem. Please do not approve this proposal.

Submission Number: ***MBTL-SEPA-DEIS-0001348***

Received: 5/26/2016 7:11:24 PM
Commenter: Shiloh Sayer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. Cowlitz County has a chronically high unemployment rate. There are environmental impacts of building trades and longshore workers having to travel as far as the Port of Seattle for work on a daily basis, instead of going to a job at Millennium. Let’s keep our jobs local! The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality.

Submission Number: ***TRANS-LV-Q1-00018***

Received: 5/24/2016 12:00:00 AM
Commenter: Barbara Scavezze
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Barbara Scavezze and I live in Olympia, Washington. There needs to be a thorough health impact analysis of coal trains traveling through our communities. They release toxic pollutants along the way. Diesel exhaust and particulate matter from operating trains causes severe health problems. Coal dust flies off the train and contaminates our air, water, and soil all along hundreds of miles of tracks. The EIS must look at the health impacts on all the communities along the route especially the health impacts to children, the elderly, the exposed workers, and those with underlying conditions such as asthma and heart disease. The coal terminal will increase greenhouse gas emissions. We are already seeing the effects of a changing climate due to greenhouse gases warming the atmosphere. Glaciers are melting, we are experiencing more severe weather throughout the country, the ocean is acidifying, and we can expect a longer dry season in the summer in Washington State. We must leave all coal in the ground to avoid the worst of the impacts of climate change. I'm a grandmother of five all under the age of four, and I ask that you reject this proposal so that my grandchildren and other people's grandchildren will have a chance to inherit a liveable planet. Thank you.

Submission Number: ***TRANS-SPOKANE-M2-00059***

Received: 5/26/2016 12:00:00 AM
Commenter: Dan Schaffer
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

SPEAKER 55: Hello. Thank you for coming. My name is Dan Schaffer. I'm a retired primary care physician, and I have lived in Spokane since 1979.

What I would like to do is to just encourage this group to consider the medical consequences of the decision that you're going to make. I think that we're dealing with issues that affect a lot of different types of people in different ways, and I don't know that it's been addressed as well as it should be in the studies that have been done.

I'm old enough to have lived with coal. I grew up in New York state. And when I was a child our house was heated with coal. It was the hard anthracite coal, which is a lot cleaner in a sense than the soft coal from the west. But even so, our basement was nothing but coal dust. And having to shovel the coal into the furnace was an experience that I'd like to not have other people experience.

I think it's important to consider what the effect of coal is on the health of the community. And I think there are alternatives to generating energy that are cleaner and much more sustainable. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000200***

Received: 5/10/2016 4:39:30 PM
Commenter: David Schafranka
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough, now it is time to move forward with a fair process for permitting. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002136***

Received: 6/7/2016 5:28:37 PM
Commenter: Jennifer Schantz
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our economy and our families are suffering. We can do something about this by supporting the proposed port at Longview that will put people to work quickly and will keep them gainfully employed for years to come. In Longview, 56% of kids need free and reduced price lunch at schools and go home to neighborhoods facing 8% unemployment. We cannot afford to look the other way when projects in this area guarantee new jobs and private investment in our schools, roads, and local services. In fact, the estimated number of jobs related to construction activity at the Millennium Bulk Terminals project is 1,350 temporary direct jobs - that will mean $70 million in direct wages! When the project is completed there will be about 135 direct jobs and about 165 indirect jobs. These numbers simply cannot be ignored. Remember this project's economic benefits to the local community. Thanks for the ability to comment. I believe the final environmental review needs to be released ASAP!

Submission Number: ***MBTL-SEPA-DEIS-0002706***

Received: 6/13/2016 1:26:10 PM
Commenter: Michael Scharosch
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000612***

Received: 5/19/2016 7:07:10 PM
Commenter: Robert Scharp
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview's quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium's proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0000994***

Received: 5/24/2016 5:55:10 PM
Commenter: Hank Scharringhausen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I’m glad to have the chance to make a comment about this project as it’s very important to me. Media coverage would have us believe that transporting coal by rail through our state is unprecedentedâ€"it’s not. We’ve transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0001929***

Received: 6/5/2016 7:17:08 PM
Commenter: Diane Schauer
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I have serious concerns about the DEIS for the Millennium Bulk coal terminal at Longview. The proposed coal terminal will dramatically increase train traffic in the Columbia River Gorge, negatively affecting automobile traffic at crossings, including emergency vehicle response time. The potential for train accidents will be increased. Release of coal dust along the trains' route will be increased. Coal dust is already entering the Columbia River from existing coal trains. This dust affects salmon, an important food source for not only native Americans but all who fish in the river and eat fish from the river. Barge traffic on the Columbia River will dramatically increase. This raises the potential for accidents and the possibility that coal will be spilled into the river. Coal dust has negative impacts on health. It is not just a nuisance. Add to coal dust toxic emissions from diesel fumes from trains and a deterioration in air quality will result. Air pollution results in respiratory diseases. I don't feel that this issue has been adequately addressed. Both state and federal governments are developing standards for carbon dioxide emissions to combat climate change. The DEIS needs to address the effect that carbon dioxide emissions from this project will have. Due to the large scope of this project, I don't feel that the mitigation that is proposed is adequate.

Submission Number: ***MBTL-SEPA-DEIS-0003247***

Received: 6/13/2016 7:09:33 PM
Commenter: David Scheer
Organization: Whatcom County Citizens Climate Lobby
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I do NOT WANT this Longview Coal Export Terminal because of the number of trains it will take to get the coal there, spitting out air pollution all along the way, PLUS the possibility of 'spills', such as just happened at Mosier, Oregon. And I DON'T want any coal shipped to Asia, simply so they can burn it and pollute not only THEIR air, but ours as well when it blows back here! We DON'T NEED any more coal burning since we have the "climate change" problem that we have! Coal, oil, and gas need to stay IN THE GROUND! SAVE the money, get your heads on straight, and SWITCH to SAFE, alternative energy sources such as SOLAR, WIND, GEOTHERMAL, HYDRO, even NUCLEAR

Submission Number: ***MBTL-SEPA-DEIS-0003225***

Received: 6/13/2016 6:59:58 PM
Commenter: Will Schilt
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. Current world markets and decision in East Asia re capital allocation over the last decade demonstrate that American coal exports are not necessary to, nor causally-related to, decisions in China, Korea or Japan to build coal-fueled power generation capacity. The environmental impacts will occur regardless of Cowlitz County and Ecology decisions to grant permits for construction of the project-specific docks and terminals in question. Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays. Sincerely, Will Schilt wtschilt@hotmail.com 82501

Submission Number: ***MBTL-SEPA-DEIS-0000725***

Received: 5/23/2016 1:20:14 PM
Commenter: Mike Schimmelpfennig
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. Thank you for accepting comments for this important proposal. The Millennium project will do a great deal for the economic outlook of this country. Let's get Americans back to work!

Submission Number: ***MBTL-SEPA-DEIS-0000878***

Received: 5/24/2016 4:44:05 PM
Commenter: Shirley Schimmelpfennig
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

In a time that has included seeing neighbors and friends out of work and under-employed, we need to encourage economic development. In my opinion, that cannot happen soon enough. That is why I am writing today. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and should be treated as such. An environmental review of this time and scope should not have been needed to redevelop an old smelter site. The Draft EIS is sufficient, it's time to move forward. Please do not delay the permitting process any further. It is important to get people back to work. There are good jobs on the line and waiting on your review.

Submission Number: ***MBTL-SEPA-DEIS-0001818***

Received: 6/2/2016 5:32:28 PM
Commenter: Gerald Schinke
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! The opening of Millennium Bulk Terminals proposed coal export facility will have a significantly positive impact not only on the state of Washington but the entire country. So I not only urge you to keep this permitting process moving forward at an efficient pace, but to also to accept the DEIS as sufficient. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002817***

Received: 6/13/2016 2:36:26 PM
Commenter: Barbara Schirkofsky
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002337***

Received: 6/9/2016 5:28:04 PM
Commenter: Kathleen Schlauch
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000729***

Received: 5/23/2016 1:28:53 PM
Commenter: Art SCHLEGEL
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn't like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. This DEIS is being finely crafted. The progress this port represents should not be hampered. It's time to get folks back to work!

Submission Number: ***MBTL-SEPA-DEIS-0000674***

Received: 5/22/2016 11:27:07 PM
Commenter: Stephen Schmid
Organization: Carbon neutral alternatives
State: Alaska

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thanks for this opportunity to oppose the Longview Washington coal terminal. Many people fear altruism as they think only of themselves. To have concerns for others is to openly pursue the truth. The reality in the world today is we are already experiencing climate change. The inability to restructure our daily lives is learned. The inherit ability to care for others in our lives not just human lives but all the flora and fauna present in our ecosystem the Columbia River basin are important. All living things significant working collaboratively deliberately a cadence in the cycle of life. From the Jumbo Glacier on the western slope of the Columbia valley to the Columbia delta. We are all tied to this verdant pyramid that binds us as members of this food chain in peril. To participate with the knowledge that comes from this sense of place when we are home. This is to know that no coal car should cross these waters, These fossil fuels from Wyoming a record of sustainable ecosystems from an ancient past need to be left undisturbed.

Submission Number: ***MBTL-SEPA-DEIS-0001949***

Received: 6/6/2016 2:02:36 PM
Commenter: Chris Schmidt
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study should move forward in a timely manner. Please allow me to provide my comments in regards to the draft EIS. This project is exactly the kind of economic boost that the state really needs. The benefits are numerous. The terminal would create jobs, generate significant new tax revenue, and help attract businesses to our area. In many ways, it can be a source of continued growth for years to come. It is tough to believe that a project with an obvious upside like this has been held up for so long. Those in charge should view this project for its benefits to the community and see it through to the finish. Our citizens are counting on it. The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward.

Submission Number: ***TRANS-LV-Q3-00029***

Received: 5/24/2016 12:00:00 AM
Commenter: Rick Schmitt
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Rick Schmitt. I've lived in Southwest Washington for 49 years. I really, really care about the quality of life in my community.

If this coal export facility is built, my concern is that over time the coal will get into the soil, air, and in our water, causing damage to us physically, to our environment. We've seen what happens in other areas of the country and it's not very attractive. This is why I do not believe we need a coal export facility in our area, particularly the Longview-Kelso area.

I'm in support of a no action alternative here, and this is why I do not support a facility here. Thank you very much for taking my testimony.

Submission Number: ***MBTL-SEPA-DEIS-0003266***

Received: 6/13/2016 7:21:02 PM
Commenter: Tyler Schmitt
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscores my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. Washington has long depended on trade and exports as a vital part of our economy, directly and indirectly creating 40 percent of all our state's jobs. Ushering in developments like Millennium Bulk Terminals - now thoroughly reviewed and vetted - will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Schmitt, Tyler (3298)

Submission Number: ***MBTL-SEPA-DEIS-0003298***

Received: 6/13/2016 8:05:42 PM
Commenter: Tyler Schmitt
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002354***

Received: 6/9/2016 5:37:38 PM
Commenter: Mark Schmutz
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study should move forward in a timely manner. Please allow me to provide my comments in regards to the draft EIS. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. Enough with the schedule delays, bring this process to a close.

Submission Number: ***MBTL-SEPA-DEIS-0002181***

Received: 6/7/2016 7:01:35 PM
Commenter: Robert Schneider
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
My comments pertain to the draft EIS for the Longview coal export facility. I hope you will give them good consideration. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. Thanks for considering my comments.

Submission Number: ***MBTL-SEPA-DEIS-0003265***

Received: 6/13/2016 7:20:57 PM
Commenter: Haley Schneiderman
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002510***

Received: 6/10/2016 6:27:13 PM
Commenter: Joanne Schoettler
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

We can live without fossil products and we can't live without water. JLS We, in the Pacific NW, are committed to clean air, water, soil and healthy beings for the region and the world. We support good clean jobs that support local industries like fishing, We support all communities having clean land/air/water and so we refuse to allow dirty poisonous coal. There is no safe way to transport these volatile fossil fuels. No community is safe. No air along the tracks is safe. No water is safe. No land is safe. No feathered friends are safe. No furried friends are safe. No salmon and our finned friends are safe. No tracks are safe. No car is safe. No fossil fuel is safe. No cleanup promise is safe. No spill is safe. No promises from the profiteers are safe. No future generation is safe. This Pacific NW Region - The Salish Sea and it's Waters, land and air are extremely sacred to all who call this place home. It gives people pleasure and beauty. It gives people awe. It gives us food. It gives us the cleanest water in the nation. It gives us wine, the best hops in the country, and hard ciders. It gives us apples. It gives us energy. It gives us joy. It gives us happiness. The Columbia, the Snake, the Spokane, other rivers and all of our waterways including Puget Sound are now tragically at risk, this just lowers the odds for a disaster. Coal trains are already disrupting our communities and local economy. More coal exports mean more air and water pollution, more traffic, and more toxic spills. If the coal companies get their way, they'll be sending 44 million metric tons of coal through Longview every year. That would bring 16 dirty coal trains down the Columbia and through Longview each day. Just one accident would be devastating. You have the power to make sure that doesn't happen. And who is going to pay for the tragedies? How can we recover if there is a spill in any of these waterways? Whose going to monitor the increase of water temperature, poisonous air, water and land from the plants, terminals and refineries? Whose paying for it? Whose paying for the people's health care around the coal communities for these terminals? Whose paying for spills along our waterways? Whose paying for the poisoning of the home for Orcas, octopus, seals, eagles, cormorants, all our finned and feathers friends? We need to Respect 1855 Tribal Treaty Rights - violation decline of continuing diminishing fishing. Fifty-seven (57) tribes have opposed coal trains. Coal will destroy the fishing grounds, it will do damages to trees then there is the poisonous coal ash. Coal ash filled with lead, arsenic, URANIUM, mercury and other poisons that will seep into the Salish Sea. This dust will be distributed throughout the West along the tracks. You want us to accept more poisonous materials and exports that will pollute the world's air and waters; a train company who has over 400 violations enforced by the State of Washington, alone. Only 1% of the tracks are inspected. You want me to accept that these fossil fuels shouldn't be kept in the ground. You want me to be ok with increasing extreme weather. You want me to be ok with water temperature levels raising above 1.5 degrees current temperature. You want me to be ok about water levels flooding villages due to increasing warning of the ice caps and glaciers. You want us to accept more mile and a half trains that can poison my people, my water, my sacred areas, my love at any moment. I do not accept these. Well, fossil fuels are not safe for Washington State or any living creature, land, water or air along the way. Have them prove they can clean up an environmental disaster with impeccability then we'll talk. Think seven generations into the future, not immediate greed and lack of foresight in our obligation as Stewards to protecting the Waters. it's for our existence. We must provide protection for our children, finned, furry and feathered friends.

Submission Number: ***MBTL-SEPA-DEIS-0000887***

Received: 5/24/2016 4:49:52 PM
Commenter: Patricia Scholes
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete it’s time for progress. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. The draft EIS to evaluate Millennium Bulk Terminals proposed Longview project should be kept within reason. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with the process in a timely manner. It's the fair thing to do.

Submission Number: ***MBTL-SEPA-DEIS-0000780***

Received: 5/23/2016 2:22:05 PM
Commenter: Kymberlee Schoonover
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. Ultimately, global warming and the impact of fossil fuels on the environment are national government and international government issues and did not need to be studied in this DEIS. Now that it's done, let's move on to the final EIS! The agencies are doing a great job of evaluating Millennium Bulk Terminals port proposal. I am convinced that this project's permit should move forward without further delay.

Submission Number: ***MBTL-SEPA-DEIS-0001986***

Received: 6/6/2016 2:37:24 PM
Commenter: Jodie Schossow
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am proud to add my voice in support of the Millennium Bulk Terminals project in Longview. The project is an excellent opportunity for the community and I am thrilled to see that Millennium has made strong commitments both to the economy and to the environment. I support Millennium Bulk Terminals site in Cowlitz County. These trains are no different than the coal cars we've transported through our state for many decades. In reality, not one ton more of coal will be used globally because of U.S. exports, and the net gain in greenhouse gas emissions is insignificant. If we don't build these terminals, energy suppliers will just look elsewhere for their supply! Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done! If coal cannot be exported and ports are not built ,the economy of the Great State of Wyoming will end up tanking. Many of us in this state depend on the jobs that are created in the mining of coal. We are not asking for handouts, we are asking that the US Government not close our mines with regulations that force mines into Bankruptcy and 1000's of miners out of work, small towns to become ghost towns and the hard-working people of Wyoming to leave the state they love and many families with young children to go hungry. We are only asking for the benifits of our hard work. We are the Equality State, but, we need to be treated Fairly.

RECEIVED
MAY 31 2016

May 26, 2016

To the Dept. of Ecology:

We strongly oppose any new coal or oil export terminals in Washington state or expansion of any existing terminals.

Such facilities cause serious environmental damage and further global warming; they endanger the health and safety of citizens, wildlife, fisheries, etc., and ultimately the planet.

Coal extraction and transport should be curtailed, and fossil fuels must be left in the ground. The science is clear about this.

It is long past time we recognize the dangers of continuing our dependence on dirty energy. We count on the department to do the right thing and reject this proposal.

Sincerely,

Lynn Schott

Stephen Schott

Lynn Schott

Stephen Schott

867 Mingo Mtn. Rd.
Kettle Falls, WA 99141
509 - 7382135

Submission Number: ***MBTL-SEPA-DEIS-0000554***

Received: 5/19/2016 6:00:37 PM
Commenter: Elaine Schrade
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

This is a great use of an old industrial site. We need more companies willing to clean up and utilize brownfield sites. Unlike many port operations, Millennium occupies a location without immediate residential neighborhoods, AND it is an existing brownfield site. It should be understood that alternate locations do not exist for situating an export coal facility with the necessary water and rail access without gentrification impacts

Submission Number: ***MBTL-SEPA-DEIS-0003390***

Received: 6/14/2016 12:45:49 AM
Commenter: Joan Schrammeck
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Regarding GHG and burning of coal - markets in Asia are rapidly changing. Due to the negative and hazardous impact of air pollution caused locally in China and elsewhere, foreign markets are moving away from burning coal. I worry that after all the expense and negative impacts that result from the building of the export facility, that they will be for naught because the market will dry up. The project can be required to make some efforts to mitigate here in Cowlitz County for the GHG emissions that result from building and operating the terminal. The larger fact is that coal burned in Asia enters the same atmosphere that the whole earth shares. It is impossible to continue burning coal if the world is to meet GHG targets set by Paris agreement and it is unwise to plan to build an export terminal to continue to export US mined coal when all life shares the same atmosphere. Significant adverse impacts of GHG emissions are felt by businesses, human health, and emergency responders who respond to larger storms, floods, and rising sea level. It makes no sense to move forward with a coal export terminal.

Submission Number: ***MBTL-SEPA-DEIS-0003396***

Received: 6/14/2016 12:54:38 AM
Commenter: Joan Schrammeck
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Regarding blowing coal dust that will result from the proposed project. I think the EIS inadequately evalulated the impact of dust on the ecology of the Cowlitz and Columbia Rivers as well as all the estuaries and riparian areas in proximity to the site. Blowing wind will carry the coal dust long distances and then water moving downstream will move the dust particles even further. The impact region studied must be much larger and cumulative impacts studied must be studied for a wider region. I've seen the pictures of blowing coal dust in Vancouver BC and I know the winds in the Columbia River are fierce. Furthermore flooding can result that will carry coal dust to areas much further away than the project site. The EIS review thus far of coal dust is not adequate. The review of rail transport safety is inadequate. A train derailment or accident anywhere along the line from the source to the terminal is likely to impact streams and rivers, with downstream impacts being cumulative over time and extremely adverse. the draft EIS is inadequate at truly evaluating the impact across many watersheds in many states.

Submission Number: ***MBTL-SEPA-DEIS-0001583***

Received: 5/31/2016 5:25:27 PM
Commenter: Barry Schreckengost
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our economy and our families are suffering. We can do something about this by supporting the proposed port at Longview that will put people to work quickly and will keep them gainfully employed for years to come. Washington is highly dependent on trade, and Cowlitz County desperately needs family wage jobs. An EIS that includes newly-invented forms of navel gazing should not have been necessary for a transportation infrastructure project that will facilitate foreign trade and create good jobs for our community. We need this project to move forward without further delays or unprecedented permit conditions. Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Submission Number: ***MBTL-SEPA-DEIS-0002292***

Received: 6/9/2016 4:55:57 PM
Commenter: Joanne Schrupp
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. I appreciate you considering this feedback.

Submission Number: ***MBTL-SEPA-DEIS-0000134***

Received: 5/9/2016 12:49:08 PM
Commenter: Bob Schuening
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough and now it is time to move forward with a fair process for permitting. This was and always will be a mill town with blue collar workers needing jobs. Do not let the extremist environmentalists slow or stop this project. Millennium has proved themselves responsible with the environment so far, so let them move forward. Thank you for your consideration. I look forward to seeing this project come to reality.

Submission Number: ***MBTL-SEPA-DEIS-0001117***

Received: 5/24/2016 7:40:07 PM
Commenter: Brett Schuler
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete â€" it’s time for progress. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. The draft EIS to evaluate Millennium Bulk Terminals proposed Longview project should be kept within reason. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with the process in a timely manner. It's the fair thing to do.

Submission Number: ***MBTL-SEPA-DEIS-0001115***

Received: 5/24/2016 7:39:06 PM
Commenter: Faith Schuler
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please move forward with the government’s environmental study. I say let's get moving with the Longview port ASAP. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied â€" get on with it already. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001123***

Received: 5/24/2016 7:43:34 PM
Commenter: Faith Schuler
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Department of Ecology should speedily complete the permitting for Millennium Bulk Terminals. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and should be treated as such. An environmental review of this time and scope should not have been needed to redevelop an old smelter site. The Draft EIS is sufficient, it’s time to move forward. Please reach out with any questions.

Submission Number: ***MBTL-SEPA-DEIS-0000289***

Received: 5/10/2016 7:08:58 PM
Commenter: Lana Schultz
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. Too often, projects that promise historic economic opportunity like Millennium Bulk Terminal get lost in cumbersome procedures and bureaucratic delays. This is unacceptable. Our communities need to foster economic growth when it comes knocking on our door. This project has the ability to deliver this, and has earned a fair and detailed draft EIS after five long years.

Submission Number: ***MBTL-SEPA-DEIS-0000811***

Received: 5/23/2016 10:18:18 PM
Commenter: Cynthia Schumacher
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

To assess heart impact of the Longview coal processing facility the follow issues need to be addressed. 1. What ill the concentration of dusts be at various distances from the processing plant. 2. What is the size of the particles spread by coal cars? 3. Wha percentage of the particles will be respirable. Respirable is a term for the size a particle must be to be deposited in the lung tissue at base of lung. 4. What are the variety of chemical does the dust contain. There are also problems presented by noise. 1. What of level of noise exposure. Does it represent an increased risk of hearing loss for plant employees or town residents. 2. What is the duration of exposure 3. Are there sudden bursts of noise or excess noise at night. Noise is associated not only the deafness, but also sleep disturbance and diseases related to increased dress, such as heart disease.

Submission Number: ***MBTL-SEPA-DEIS-0002020***

Received: 6/6/2016 3:04:35 PM
Commenter: Jennifer Schurle
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. When the trains are loaded in Montana, Millennium puts a liquid cover like a glue on top of the cars. This eliminates a lot of the coal dust that would normally come off of train cars. Millennium is building this world class export facility right! Remember what matters and keep the focus local! I'm certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

Submission Number: ***MBTL-SEPA-DEIS-0000927***

Received: 5/24/2016 5:14:09 PM
Commenter: Dean Schwab
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Longview is a town built on natural resources and import/export. I believe this project is a perfect fit for our community. Cowlitz County has a surplus of industrial sites which impedes the development of the Reynolds Smelter site (due to cost of remediating and redeveloping a brownfield site). Millennium is taking on the redevelopment and can turn around a dilapidated, underutilized site. Grant the project its permits! I appreciate you considering this feedback.

Submission Number: ***MBTL-SEPA-DEIS-0001723***

Received: 6/1/2016 9:18:46 AM
Commenter: Joe Schwab
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I believe this port if extremely important to Wyomings work and economy, but please change the name. Millennium reminds me of millennials and they are for socialist not capitalism

Schwab, Karla (0928)

Submission Number: ***MBTL-SEPA-DEIS-0000928***

Received: 5/24/2016 5:14:38 PM
Commenter: Karla Schwab
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. The economy depends on trade. It creates jobs working the railroads and ships, loading cargo at the ports, growing crops for export, and building the infrastructure necessary to support a trade-based economy. However, trade depends on permitting approval to construct this infrastructure. If the federal, state, or local government apply different permitting standards to projects exporting coal, they are creating a dangerous precedent that will make it hard to build new infrastructure needed to export other goods, like wheat or manufactured products. The environmental groups have a long history of challenging trade based projects in the northwest, such as Columbia river dredging, new rail facilities and/or export terminals. Governments shouldn't threaten trade or the jobs that depend on it. The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003202***

Received: 6/13/2016 6:30:15 PM
Commenter: Angela Schwartz
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. MBT has received a thorough and comprehensive draft EIS, five years in the making. If we don’t take the next step forward and turn this vision into a reality, it’s going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. The opening of Millennium Bulk Terminals proposed coal export facility will have a significantly positive impact not only on the state of Washington but the entire country. So I not only urge you to keep this permitting process moving forward at an efficient pace, but to also to accept the DEIS as sufficient. Thank you. Sincerely, Angela B Schwartz anflan5@yahoo.com 99301

Submission Number: ***MBTL-SEPA-DEIS-0003835***

Received: 6/14/2016 1:20:33 AM
Commenter: Steve Schwartz
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments
Submission Text
Steve:

Hi, my name is Steve Schwartz. I live here in Missoula. I'm a professor interior of the Department of Communication Studies at the University of Montana. I teach and do research in environmental communication. No matter what the coal industry says about the free market, their goal is to get government on their side to make the market work for them whether it's supporting carbon cash receipt frustration, whether it's blocking the clean power plan, or supporting coal export infrastructure like MBT as a goal. It's past time for us to use our voice to remind government agencies who's side they need to be on and who's interest they need to represent.

The connected and key note we've heard about tonight on public health and safety, on air, land, and water, on wildlife, and on climate change are common in house. They're shared by the residents of the Pacific Northwest, shared in common by the people who live in Washington and Idaho and here in Montana. We all deserve a voice in this decision. For that reason, I want to thank all the organizations that have made this opportunity possible for so many of us to express our voices. To protect the commentators in the Department of Ecology, to take no action, thank you.

Steve Running: Yes, I want to particularly point out what I see happening in the global coal markets and global carbon cycle science. That's the stage that I work in, global carbon cycles. We, probably a decade ago, first identified really clearly that the biggest single carbon emission by humanity is burning coal for electric power. It became clear to us right at that point that everything else we do in trying to reduce carbon emissions wasn't going to matter at all if we didn't, first and highest priority, quit burning coal for electric power.

That was over a decade ago. It didn't seem like we were making much progress until about the last year. I can finally say that we've had a pretty good year in global policies. Obviously we all know about the Paris Climate Agreement where every nation signed on to a commitment for driving down carbon emissions, and for most countries that first biggest carbon emission is burning coal for electric power.

What's more immediately relevant to us here is that China not only signed the Paris Agreement, but China actually does a 5-year strategic plan for the nation. What a concept to actually plan the future of your nation. We've got learn something here. In the last 5-year plan, China has publicly announced that they will quit importing coal. What we're clearly seeing is that in 2014 and 2015, China's coal imports went down by actual statistics, so they're making good on this strategic plan that they've announced.

They are starting to drive down their purchasing of imported coal. Of course, their 2 biggest sources are Australia and us. They have already announced that they have a strategic objective to quit buying coal. I can't imagine a worse time for America to be building more coal infrastructure when the biggest customer has already announced publicly that they're going to quit buying. This is really almost a no-brainer.

What I also see now in this last year is that the world financial community has really started to catch on that long-term fossil fuel investment, and particularly long-term coal infrastructure investment, is just plain a bad idea. It's a bad investment. You have very high probability of losing your investment with the trajectory of the global economy and energy. When the world bank and Goldman Sachs, I read almost every week another major financial institution announcing that they are getting out of coal investment ... What we see here is the local version of that same decision point.

You would think this ought to be an easy decision, that the last thing the Pacific Northwest would want to do is invest in long-term infrastructure for coal export when a major customer has already announced that they're going to be capping their imports. I think this is to me, at the global scale that I work at and study and follow, this really should be a pretty easy decision then. This is certainly not a terminal that we want locally, but that even makes any sense in terms of a larger financial picture. It just doesn't make sense one bit. I think that's what I want to leave with you on this topic. Thank you.

Paul Smith: I'm really happy to get a chance to comment on the health implications of the increasing coal shipments by rail for our communities and others. It's easy to make the case that negative health impacts with coal will occur because they've been occurring for the last several hundred years. There's no reason to think a little bit more is better.

I hope to stress the health threats local to Missoula and also stress that this new threat will be greatest on the vulnerable, including children, infants, the unborn, and the elderly. I also have a list of references that I always feel nervous talking and making statements without. If anybody wants the list of the references that at least give the health implications, please see me. Because I take care of children and infants with lung disease, obviously my main concern at the local level is the increase in air pollution from these diesel fumes, coal dust, and worsening climate change.

Data is substantial showing that coal trains do increase bloom concentrations. Diesel emissions are recognized as carcinogens, which was previously noted, and contain toxic substances such as polyaromatic hydrocarbons and particulate matter or PM. Coal dust also adds to air pollution in the form of particulate matter. Of the 6 criteria of air pollutants that the EPA is mandated to regulate, particulate matter is perhaps one of the easiest to track and to correlate with health effects.

It's generated a vast amount of medical literature. We know there is PM increase as public health worsens. We also know that when we lower particulate matter, population health improves. That's an important concept and lends significant credibility to particulate matter being culpable, and justifies action that lowers air pollution. Particulate matter leads to lung damage and diseases such as asthma and COPD. Children are at the highest risk because their lungs are developing and they have more life years of exposure.

This often worsens over decades from accumulating scar tissue along the airways by repeated injury. We have no cure for asthma. For today's living asthmatic children, they may end up being tomorrow's asthmatic cripples. In health, particulate matter also leads to diseases distant from the lungs such as heart disease, stroke, and cancer and even adverse effects on pregnancies and fetal tissue. Infants born to a mother exposed to high concentrations of particulate matter are born smaller, and with impaired lung function.

These more systemic effects outside of the lung happen in part because fine particulate matter can also cross pulmonary system directly into the circulation and they release whatever poisons they contain. Missoula already struggles with air quality in a large part because of our valley inversions that attract pollutants. Despite strong efforts to decrease particulate matter, we often, here in Missoula, are close to the prescribed threshold by the EPA for particulate matter.

There is no safe lower threshold. The more time one spends in high exposure of particulate matter, the greater the effects. Again, this is of special concern to children. Another health concern with coal dust is increased chance of train derailments. You might recall an article in the Missoulian last year quoting the Department of Transportation estimating that there would be over 10 derailments per year in the US of trains carrying nothing but ethanol and oil cargo alone. Missoula is a very populated area. It's time we realize that with only 2 hospitals in our town, we would struggle to handle the type of derailment disaster that hit Quebec killing 47 and devastating a small

town.

Then finally the effects of coal combustion on climate change are already significant here in Montana. As it was noted, we've already come through 2 of the warmest years on records and the warmest April on record. Our snow pack is already lower than normal this year and it's disappearing. Our farmers and ranchers are threatened. Increased forest fires and hot weather will again threaten our health and our children's health.

By way of closing, one of my favorite quotes when giving a talk like this is from CF Elliot in 1909. He was then secretary of Anaconda Copper Mining Company. He stated, "We have the perfect right to carry on a legitimate business and if incidentally we should pollute the atmosphere nobody has the right to complain until specific damage gives them a cause of action." This statement really describes the position that we're in as a company.

We can't stop a process legally until we can show harm. By then, the ground, the air, and the water are contaminated, and our children are sick and it's too late. So ask yourself when we're coming through these discussions what angles are we heading in? Is the public being shouldered with the responsibility to prove harm or is the impetus on the industry to prove there's no harm? Harm to health has already been shown. There is specific cause for us to halt more pollution.

John: Good evening. I'm John Woodland. I retired in January as the Superior, Montana Fire Chief. I'm speaking from my background in emergency services, I do speak for myself. Superior is one of the many small towns along the rail line that this project will negatively impact. Emergency services and access to many of my district's neighborhoods require crossing the tracks. That's true of many other towns along the rail line. This is what's hauling our water supply across the tracks.

I personally waited at a grate crossing for a train to pass while on an emergency service response. This proposal lacked the train traffic. It increased the likelihood emergency services will be negatively impacted in communities all along the tracks. The tracks in Mineral County in places are built right along steep mountainsides next to the Clark Fork of the Columbia River. Trains fall off these tracks sometimes into the river and not that infrequently.

In my 10 years as the fire chief there have been 2 trains in the river in Mineral County. One visible from my home, included empty oil cars, and the other dumped Boeing fuselages into the Albertan Gorge. More traffic means more wrecks. More traffic will also mean more pressure not to hold up the trains for maintenance work which means yet again more wrecks. For Montana, Eastern Washington and Idaho, it also means less access and higher prices to ship agricultural products. For emergency services, today the 800-pound gorilla in the room is climate change.

If you don't think that's emergency service issue just look at the newspaper for the last week, at the evacuation of between 80 and 90,000 people from Ft. McMurray in May in

Northern Alberta, months before there's supposed to be a fire season in that part of the country. This is the future for the entire inter-mountain west if we don't act decisively now with climate change. We cannot continue to invest in fossil fuel projects, such as Longview, and have any chance of limiting the worst impacts of climate change. I urge you to say to no to the Longview Coal Port and yes to acting decisively on climate change now before it's too late.

Michael: My name is Michael Daniel Bolt. I'm a student at the University of Montana. I'm running for House District 98, Montana State District. I think preventing any new coal mining is the best choice. I'm also interested in bringing ideas of increasing government control over the natural resource industry including the coal industry. I believe government run operations of the coal industry would allow us to shut down that industry more responsibly and make any future natural resources extraction use projects really more beneficial to the Montana people. That's the main concession. That's all. Thank you.

Carolyn: Hello, my name is Carolyn Walker. I used to be Carolyn Alderson. I lived along the Tongue River for 20 years of my life. I raised my 3 children there. There is an interesting story about a law and a regulation that actually stopped something. When I lived down there, the Northern Plains Resource Council, I was part of it, was just beginning. That's when you all heard of the Tongue River Railroad. The Tongue River Railroad was thought of and started because there was a mining plan for that area, right on the Tongue River. It was called the Montco Mine.

Well there's a nice picture of me shaking hands with President Carter in 1977 at the signing of the strip mining bill. In that bill there's a piece of the legislation that says, "There shall be no strip mining on Alluvial Valley Floors." The Montco Mine was right on the Tongue River. It caused some difficulty in the community. I just wanted you to know that there are ways to use legislation and rules to stop bad things from happening. My recommendation is that we recommend no action on the Longview Port.

Jim: My name is Jim Parker. I live in Missoula Montana. As a Montanan along the rail corridor between the Powder River Basin mines and the proposed terminal I oppose the Millennium Bulk Terminals because of the associated increase in coal train traffic through my community. The increased coal train traffic will bring with it increased air pollution and health risks from increased coal dust and diesel exhaust and increased noise pollution.

In addition, the increase in coal traffic through my community will reduce access across the tracks and cause traffic delays for citizens, commuters, for emergency response vehicles when there's a medical emergency or fire, or a need for police. The additional train traffic will also provide greater potential for vehicle collisions with trains and for pedestrian accidents.

As a Missoulian and Montanan, I'm asking that the EIS fully analyze and consider the impacts of this port and the increased coal train traffic would cause here in Missoula and across Montana especially as it relates to the above sited impacts. The proposed project’s impacts are real and significant to Montanans and are connected in cumulative

result of what happens if this project is approved.

The EIS prepared by the court in the Washington Department of Ecology in Cowlitz County must include all the connected and cumulative impacts in Montana that will result if the MBTL facilities are approved and constructed. These include the significant connected and cumulative impacts on the project all the way back through Montana to the Power River Basin Coal Mines in Montana and Wyoming.

The increased rail traffic in Montana must be addressed, analyzed, and its consequences fully considered in the EIS. More trains in Montana will mean an increase in the amount of airborne pollutants, from diesel engines as well as from coal dust. Medical studies have shown a clear link between both diesel air pollutants and coal dust and disease.

While those with chronic disease, the elderly, young children, and pregnant women are most at risk, the health effects from particulate matter exposure may occur years later. Even healthy individuals need to be concerned. These issues must be addressed, analyzed, and their consequences fully considered in the EIS. The MBTL facility will directly lead to an increase in the burning of coal. The link between increased coal burning and associated public health problems cannot be ignored and should be included, analyzed, and the consequences fully considered in the EIS.

Finally, because the sole purpose of the MBTL facility is to facilitate the shipping of coal being transported from the PRB to its final destination in Asia, where it will be burned for energy, I also believe that the EIS must fully consider the long term and direct effects that this action will have on the global climate.

In conclusion, I strongly oppose the proposed Millennium Bulk Terminals Longview facility. The connected and cumulative impacts to Missoula, and all of Montana, from the proposed facility, are real and significant. The EIS prepared by the co-lead ggencies for this project must address, analyze, and consider all the connected and cumulative impacts this proposal will have on Montana. Please reject this proposal and take no action.

Thank you.

Harold: I'm Harold Hoem from Missoula. The whole town of Butte Montana went through a long period of horrible air quality early in this century because of ore smelting. Read a book called Smoke Wars. People sickened and then died especially underground miners like my grandfather who was cut down in the prime of life by lung disease. The corporate giants called the air pollution a nuisance. It was deadly. Oh, what a nuisance Biff was to my family.

What are some corporations proposing to do this century later but ship Montana coal overseas so citizens there can get sick and die from nuisance called coal? A friend of mine who was a former coal mine manager says this, "The problem with the coal mining industry is the product is a poison”. We know that CO2 is increasing dramatically. It is now over 400 parts per million. Humanity hasn't seen this stuff but it is affecting climate

change dramatically.

The current wildfire in Ft. McMurray in Alberta Canada caused the evacuation of over 88,000 people. The smoke from each building is hundreds of miles away. Perhaps a wake-up call for Montana. We have rapidly declining snow pack and are facing longer and harder, tired, and more dangerous fire seasons and possibly worse than Iroquois. For sure a nuisance for residents and a real downer for tourism. The DEIS gives Montana a scant potential.

They say 16 additional coal trains a day would go through Missoula that cite inflated numbers for existing traffic of 25 to 28 trains. We currently see only 13 to 15 trains. 16 more trains would double current traffic. The effects would ripple down all the impacts of safety risks, derailments, noise, dust, the laser crossings et cetera. They should know where our current capacity is and give assurances that deficiencies will be mitigated. My last word , bring down CO2 emissions by switching to renewables. Vote no action. Show the US means business in climate litigation.

Gary: I'd first like to thank Northern Plains and the Hoems in particular for it, and Les Anderson coming all the way from Longview to speak here. The speakers, it's been a very nice haven. Thanks for this opportunity to comment. Hi there, I'm Gary Mattson. I live in West Riverside, which is a suburb of Milltown. I really seriously, if the most serious effects of this port certainly have to do with health and climate change.

For those reasons, I am just baffled that so many people either ignore the science, or deny the science, or simply don't know about the science. I cannot understand why we have so many people that are not supportive of recognizing climate change demand. Some of the effects aren't realized. I can see in my community. Milltown has one singal entrance to it across on the south side of Powder River, there is one railroad crossing.

If that railroad crossing was blocked, no emergency services can occur. Our fire chief manager will recognize that concern. In Missoula County that's 10. That has a significant impact. The additional of 16 trains would really be a big impact on emergency services. For multiple reasons, I would strongly recommend that no action alternative.

George: Thank you, thank you all for being here. My name is George Price. I was asked to represent an organization I belong to named Indian People's Action. Indian People's Action asked me to be here as an environmental issues coordinator.

I would like to put our input collectively in here; just the fact the basis what coal is doing to our climate and the life on earth. I think that should be enough reason to keep it in the ground, not transport it anywhere. Anybody who's paying attention and looking at how fast this is escalating climate change to an unpredictable level at levels with all the other elements that are being released. Rising sea levels, you can go down the whole list if anybody's honest about that, you would say yes, let's stop all of this.

I'd also like to say let's look at the paradigm shift and deeply question a society that creates incentives for people to write environmental impact statements that are

intentionally lying to the people for profit, for money in a society that lives for money. I'm not going to go into my whole historian's diatribe there. I had often wondered what if the people who came from across the ocean, and likeminded people that welcomed innovation in Massachusetts had come to learn instead of to control. It's great. Can we start on the right foot now? I recommend the no action on behalf of Indian People's Action of Montana.

Dave: Hi, my name is Dave Dittloff. I'm the regional representative for National Wildlife Federation. Most of you are probably aware of National Wildlife Group. We're the folks who put on Ranger Rick Magazine. That's our biggest identifier here with the kids.

In 3, 4 years that that's going to take, yet there's nothing coming back up the streams in order to spawn salmon. The impacts are almost certainly down to relating to some of the impacts here. Last year, last summer's conditions literally had most of the species dying, most of the adults coming back to the rivers and streams here to the headwaters of the Columbia River Basin died due to high temperatures, directly related to climate change.

I want to talk a little about, quickly here's something that hasn't been hit hard today, talk about wildlife. It starts right from the beginning. You look at the mine site here, the direct habitat displacement, the coal recommendation that follows it, that impacts wildlife. If you look at what happens on the mine sites with water, that impacts fish and wildlife. The next connector we look at has it transferred over? We look at the trains. There's been a lot of talk about human health and consequences here which are really important. Those same impacts are related to wildlife for particularly the fisheries here. That coal dust gets in the streams. There's mercury concern with it here and other neurological issues are a concern.

Mercury is bad for people eating the fish as well. We've got dozens of streams and multiple dozens of lakes in Montana that had mercury consumption warnings here. You can only eat so much of the fish. That's an impact to wildlife. You look at the ports, same thing here. The direct construction of the ports, this place is habitat for sure. That has real consequences to the fisheries. You'll see salmon come in and out of the ocean as well here.

Lastly, climate change, I got to talk to you about salmon. Name a critter, even the biggest critters, white tail deer, elk, etc. that think generalist that those are for generalist. There's impacts here. More and more research that's done it's really impact of Montana's out pour heritage, it's culture, what we like to do here whether it's sightseeing, hunting, fishing, what have you here. Fishing is a multi-billion dollar industry in Montana and the Pacific Northwest. There's economic reasons associated with wildlife as well here. I appreciate it. No action alternative makes sense for wildlife.

Dave Jones: Hello, my name is David Jones. I've been a fly fishing guide in Montana for over 30 years. Dave just inspired me to get up here and talk about what I see in my career fishery that I work primarily in. My season has been shortened by an average of about 6 weeks in the 30 years I've been doing this. We don't have clients in August anymore at all because of

the low flows. Half the time our rivers are shut down because we have to worry about railing over there. Anybody that watches the forester around in the spruce moss and the beetle kill, it's just obvious that Montana is being really affected. We mentioned the economic impact, but really we're talking genocidal, ecocidal impacts for climate change. We ought to think in those terms really. This is an emergency. I recommend no action on the terminal. Thank you.

Steve: Hi, my name is Steve Schwartz. I live here in Missoula. I'm a professor interior of the Department of Communication Studies at the University of Montana. I teach and do research in environmental communication. No matter what the coal industry says about the free market, their goal is to get government on their side to make the market work for them whether it's supporting carbon cash receipt frustration, whether it's blocking the clean power plan, or supporting coal export infrastructure like MBT as a goal. It's past time for us to use our voice to remind government agencies who's side they need to be on and who's interest they need to represent.

The connected and key note we've heard about tonight on public health and safety, on air, land, and water, on wildlife, and on climate change are common in house. They're shared by the residents of the Pacific Northwest, shared in common by the people who live in Washington and Idaho and here in Montana. We all deserve a voice in this decision. For that reason, I want to thank all the organizations that have made this opportunity possible for so many of us to express our voices. To protect the commentators in the Department of Ecology, to take no action, thank you.

Jim: My name is Jim Roach. I've been a Missoula resident for 45 years. I don't understand why it's draft Environmental Impact Statement doesn't address impacts for rail traffic in Montana. That seems sort of ridiculous. It seems like a rip off. On behalf of my family, and my friends, and a lot of people that I know are neighbors, I just want to say we don't want any more coal dust. We don't want any more diesel fumes. We don't want any more threat of derailment. We don't want traffic complications from increased rail traffic. We don't want the noise.

Most of all we don't want the climate impact. We don't want the endless smoky summers. We don't want the low stream flows and the sick fish. We don't want the reduced fishing opportunities. We don't want increased beetle kill. We don't want disappearing biodiversity. We don't want damage to agriculture. We don't want the drought. We don't want climate refugees. We don't want shut downs of skiing areas. We don't want this action, no action. Thank you.

Claudia: My name is Claudia Narcisco. I am speaking for myself today. When I was trying to find some things that I was going to speak about, I found an old letter that I had written in I guess November 2013. There goes my letter. I had it on my phone and mailed it to myself. Anyway, it was hard enough to read. I emphasized that connection actions between the mine and the port and Asia and the impacts on climate change and how it would cycle back to us.

I requested that they consider this. I cited a section of the National Environmental Policy

Act. I believe it was section F2 or 2F that specifically directed agencies to consider international ramifications of actions which is not something that we normally associate with, but it's just that it was our responsibility to do that. Obviously those things were not necessarily done, as far as I could tell, to this point.

I hope that's considered.

Susan Lee Schwartz
1240 Sycamore Place
Longview WA 98632
360-425-7553
sschwartz1970@hotmail.com

The Millennium Coal Export Plant in Longview will be the world's largest coal plant with 44 million tons a year going through Longview. We need to ask what Happens if China stops buying coal from the United States.

There will be 8 trains coming full of coal to the coal plant each day and 8 leaving empty. The trains will equal 16 trains with a 120 rail cars per train. It will take time and stop traffic going to Lewis and Clark Bridge. What happens to person has a medical emergency and need to get to the hospital?

The Port of Longview has about 800 employees most of them working for other companies, which are working at the port on 835 acres and Millennium Coal Export Plant 135 permanent employees on 416 acres. When you add in the rail and shipping there will be 165 jobs all together. I believe we can bring a company in which will offer more jobs on the 416 acre land.

There will be 70 additional ships per month, which equals 840 per year on Columbia River.

I think the DEIS was short sighted in not addressing the coal dust problem. Coal dust does cause medical problems for people with asthma and dry eyes. I think you should study coal dust to find out if it is a cause of black lung.

What companies will not locate here because of the coal company.

Construction will take 9 years to complete the project and it will be in 2 stages. First building demolition, second building the coal export plant.

The Columbia River is on a major earthquake fault line. What will happen if we have the earthquake the scientists are predicting will happen? There is a potential for impacts of the Pacific Ocean seduction zones.

Please look into ground water and aquifer possible contamination. Fluoride, suffer dioxide and mercury emissions are what you need to look into. Fluoride, suffer dioxide and mercury are emissions, which could potentially will affect Washington and Oregon State.

From the Millennium Coal Export Plant there will be greenhouse gas emissions, which will not be good for the planet.

I support no action alternative.

Submission Number: ***TRANS-LV-M2-00111***

Received: 5/24/2016 12:00:00 AM
Commenter: Susan Schwartz
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Susan Lee Schwartz (phonetic), and I'm from Longview, Washington. And I support a no action alternative. I think it very important. We need to be asking some questions. And one of them we need to ask is what happens if China stops buying coal from the United States, you know, what's going to happen.

And right now China is signing all these agreements for global warming and saying they're going to do things about global warming, which means they're trying to get rid of their coal that they're using and they will start using their solar energy.

There will be eight trains coming full of coal and then the eight trains will leave empty. And this will equal 16 trains with 120 cars per each train. It will take time to stop traffic going across Lewis and Clark Bridge. What happens if a person has a medical emergency and needs to get to the hospital?

The Port of Longview has about 800 employees on-site with all the companies and the longshoremen and everything. But there's 416 acres for this site. And there's only going to be only 135 employees. You add in rail and shipping and that's 155 all together.

There will be -- I think DEIS was shortsighted in not addressing the coal dust problem. Coal dust does cause medical problems for people with asthma and dry eyes. I think you should study and should also look into black lung and that effects as well.

And then don't forget the earthquake fault, the major one that's there and what happens if the thing goes. So I will say thank you for listening to me and I will send this to you.

Submission Number: ***MBTL-SEPA-DEIS-0000955***

Received: 5/24/2016 5:32:29 PM
Commenter: Randall and Diane Schweer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Moving this project forward is important to me, my family and my community. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage?

Submission Number: ***MBTL-SEPA-DEIS-0002116***

Received: 6/7/2016 5:11:29 PM
Commenter: David Schwend
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it's time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. In regards to coal dust & human health impacts: Please refer to the American Lung Association's report on state / county rankings. First please note that the incidence of pediatric and adult asthma for Cowlitz Co is 9.1%, Clark Co. is 9.0%, and Yakima Co is 8.9%. Then compare this same statistic to communities where coal is produced or shipped through such as Campbell Co WY at 9.0%, Box Butte Co, NE (Alliance) 6.96%, Lincoln Co NE (North Platte) 6.98%, or St. Louis Co MO 7.68%. Further, the ALA ranking for 24 hr particulate matter in Campbell Co WY scores a grade of B, as compared to Clark Co WA at F and Yakima Co WA at F. The evidence is obvious, coal production and transportation is not causing a health problem, but it can act as a remedy to an economic downturn. There might not be many who know how much coal is used in everyday occurrences, but for those who do, know Millennium's project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both. Thanks for reading my comments.

Submission Number: ***MBTL-SEPA-DEIS-0001490***

Received: 5/31/2016 1:34:16 PM
Commenter: Molly Schwend
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. Media coverage would have us believe that transporting coal by rail through our state is unprecedentedâ€"it's not. We've transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you. Sincerely, Molly Schwend mschwend5@gmail.com 59044

Submission Number: ***MBTL-SEPA-DEIS-0001682***

Received: 5/31/2016 6:41:33 PM
Commenter: Molly Schwend
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

In a time that has included seeing neighbors and friends out of work and under-employed, we need to encourage economic development. In my opinion, that cannot happen soon enough. That is why I am writing today. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. It is important that the public have the ability to comment on projects of this nature as the affects will last for years to come. Thank you for the opportunity to comment and please see that this project is worthy and should be allowed progress forward and develop.

Submission Number: ***MBTL-SEPA-DEIS-0003144***

Received: 6/13/2016 6:02:36 PM
Commenter: Ashton Scott
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***TRANS-PASCO-M1-00052***

Received: 6/2/2016 12:00:00 AM
Commenter: Phil Scott
Organization: Friends of the Columbia Gorge
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. My name is Phil Scott (phonetic), and I am affiliated with Friends of the Columbia Gorge. My educational and professional background is in environmental health and public health, together with a degree in risk management. In my opinion the Draft EIS because it fails to consider the public health implications associated with the transportation, storage and use of coal.

The impact of diesel in increase of noise from trains together with coal dust and associated toxins: Lead, mercury, arsenic, oxide; and ozone associated with burning coal need to be recognized; downstream use; as well as chronic diseases, as the last gentleman mentioned, are directly associated with coal emissions.

According to the Physician's for Social Responsibility statement, coal affects all major body organs, systems and contributes to higher mortality rates in the U.S., Heart diseases, stroke and chronic respiratory disease. Global warming is a reality. Any jobs created are temporal at best.

Coal is a dying industry which has already been supplanted by wind and other alternative fuels. The demand for coal is decreasing in Asia. And China recognizes the environmental deterioration that is associated with coal. How absurd is it to propose this only to have the associated pollutants directed via wind currents back on us and adversely affecting our health? We need to consider preventative strategies and long-term interests. Please deny the Millennium Bulk Terminal permits.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002742***

Received: 6/13/2016 2:00:42 PM
Commenter: Gary Scrimsher
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits.And it will support rail infastructiure in the eastern part of the state, and provide more jobs outside of the port area. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002860***

Received: 6/13/2016 2:50:39 PM
Commenter: Gary Scrimsher
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. And it will support rail infastructiure in the eastern part of the state, and provide more jobs outside of the port area. Thank you

Submission Number: ***MBTL-SEPA-DEIS-0002861***

Received: 6/13/2016 2:51:29 PM
Commenter: Michael Scrimsher
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you

Submission Number: ***MBTL-SEPA-DEIS-0002857***

Received: 6/13/2016 2:49:29 PM
Commenter: Skyler Scrimsher
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you

Submission Number: ***MBTL-SEPA-DEIS-0002633***

Received: 6/13/2016 11:53:00 AM
Commenter: Erik Seaberg
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. I am the President of Boilermakers Local 502, and this facility would benefit all of our members and their families. Please help our communities and everyones way of life and bring work to our families. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002046***

Received: 6/6/2016 7:25:56 PM
Commenter: Alan Searle
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I was brought up with coal heating, coal cooking and coal gas for light. For many years I thought that was how things were. The fact that the fogs turned to yellow smogs when it was cold and still in the winter, my grandfather (a coal miner) coughed up coal dust, and the buildings were black and dismal didn't cross my mind until it changed and we cleaned up the air. Exporting coal means exporting pollution, both particulate and CO2 emissions. We are better than this. We do not need coal passing through our cities. We need to leave coal in the ground and spend the effort and money on developing clean alternatives. We also need to make sure that jobs we lose in coal extraction are replaced and retrained to renewable resource development.

Submission Number: ***MBTL-SEPA-DEIS-0002232***

Received: 6/8/2016 12:27:15 AM
Commenter: Jerline Searle
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I object to this terminal being built. Safety for our environment should be more important than selling coal on an international market. There has been information available in regards to coal burning problems related to our environmental health since the 1950s. Allowing this terminal to be built would mean ignoring public health concerns for our world! Please do the right thing and do not allow this!

Submission Number: ***MBTL-SEPA-DEIS-0001667***

Received: 5/31/2016 6:30:18 PM
Commenter: Peter Seekell
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am proud to add my voice in support of the Millennium Bulk Terminals project in Longview. The project is an excellent opportunity for the community and I am thrilled to see that Millennium has made strong commitments both to the economy and to the environment. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn't like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward.

Submission Number: ***MBTL-SEPA-DEIS-0002614***

Received: 6/13/2016 11:32:02 AM
Commenter: Todd Seeley
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I feel providing high quality coal to the rest of the world would be better for than environment than just letting them burn low quality coal. I feel other countries are going to burn coal anyway we might as well try to positively influence it and give them the option of better coal than what they are burning. This would also stimulate economic growth in the united states and around the world.

Submission Number: ***MBTL-SEPA-DEIS-0000988***

Received: 5/24/2016 5:51:28 PM
Commenter: Natasha Seibel
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. Cowlitz County is fraught with uncertainty. Millennium’s proposal, however, offers all the economic benefits of a long-term port facility without any of the uncertainty. Coal is needed by other countries to help shape their future and enhance their quality of life. Let's give other countries the living standards we have for ourselves.

Submission Number: ***MBTL-SEPA-DEIS-0000883***

Received: 5/24/2016 4:47:32 PM
Commenter: Virginia Selby
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Coal exports are a huge opportunity for the Northwest. The infrastructure coal companies are creating will expand trade of all kinds, from apples to software. At a time of increased competition from both West and East Coast ports, Washington needs to seize these opportunities to expand trade and create thousands of family-wage jobs. Millennium Bulk Terminals EIS should be thorough but held to the same standards as any other port proposal. We need to do everything we can to strengthen and grow the economy of Washington and the west in general. The project proposed will do just that. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001788***

Received: 6/2/2016 5:06:37 PM
Commenter: Daniel Selsor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn’t have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on Millennium’s application.

Submission Number: ***MBTL-SEPA-DEIS-0000020***

Received: 4/30/2016 12:24:21 PM
Commenter: Mike Sennett
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The enormously destructive impacts of this project are now confirmed & exposed. The plans for MBT should be thrown into history's dustbin to join the other NW coal terminal projects that died. GPT will be there very soon. During this scoping process most of the coal companies in the Powder River Basin have become bankrupt, indicating the uncertain future of the industry. The cancellation of the Otter Creek Mine in Montana would deprive MBT of much of its coal supply to begin with. The report also highlights what a great source of pollution & social disruption caused by the railroads, especially Mr. Buffet's BNSF. All the communities along the rail routes from the PRB to Longview would become sacrifice zones & degrade the health & well-being of all residents. Let's bury this project and prohibit any & all fossil fuel export projects along the Columbia River.

Submission Number: ***MBTL-SEPA-DEIS-0003330***

Received: 6/13/2016 8:57:21 PM
Commenter: Mike Sennett
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The coal trains are the heaviest trains & are weakening the tracks & causing derailments. I live in Whatcom County,WA where the BP refinery receives 1 oil train a day & the Phillips 66 plant gets 1 every other day. To have coal trains running on the same tracks as the oil trains is inviting disaster all along the railroads. Since BSNF is obligated to deliver the oil trains to Washington refineries, there should be a ban on coal trains, thus invalidating the Longview coal terminal.

Submission Number: ***MBTL-SEPA-DEIS-0002461***

Received: 6/10/2016 2:10:47 PM
Commenter: Fred Septka
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Millennium Bulk Terminals has proposed a coal export terminal at Longview that is both environmentally-sound and economically beneficial. I ask that you approve this project and the environmental study without delay. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it’s time Longview went back to work. I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001893***

Received: 6/3/2016 11:46:49 AM
Commenter: Aaron Sessions
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
The benefits of a port to export clean and reliable coal from U.S. to Asian markets is clear. We can not let fear of preventable health and environmental damage possibilities stifle progress.

Submission Number: ***MBTL-SEPA-DEIS-0002407***

Received: 6/9/2016 6:16:05 PM
Commenter: Aaron Sessions
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Moving this project forward is important to me, my family and my community. Media coverage would have us believe that transporting coal by rail through our state is unprecedented, it's not. We've transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. Please reach out with any questions.

Submission Number: ***MBTL-SEPA-DEIS-0002223***

Received: 6/7/2016 7:35:42 PM
Commenter: Setchfield
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. Enough with the schedule delays, bring this process to a close.

Submission Number: ***MBTL-SEPA-DEIS-0000922***

Received: 5/24/2016 5:12:26 PM
Commenter: Lisa Setser
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close and move on to a permit decision. When the trains are loaded in Montana, Millennium puts a liquid cover like a glue on top of the cars. This eliminates a lot of the coal dust that would normally come off of train cars. Millennium is building this world class export facility right! Remember what matters and keep the focus local! Thank you for taking my comment and for providing the opportunity to weigh in. I believe strongly in this project and hope that you will consider the strong commitment Millennium has made to restoring and protecting the environment in our community. Sincerely, Lisa Setser lsetser2004@yahoo.com 46350

Submission Number: ***MBTL-SEPA-DEIS-0001448***

Received: 5/29/2016 11:30:27 AM
Commenter: John Severinghaus
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for this opportunity to comment on the proposed Millennium bulk coal transfer project through Spokane. With her agreement, I am writing on behalf of my wife Rebecca Severinghaus, as well as myself. We live in Spokane. We are particularly concerned about the number and length of trains coming through, and the associated coal dust. We are equally concerned that this project promotes use of an older, proven markedly polluting source of energy, worldwide, leading to additional pollution of the air and wind currents. We understand many proponents want the jobs the project would offer. We hope that government and private collaboration would result in hiring these same individuals on projects such as clean energy production and upgrading the national infrastructure, long-delayed in recent years. Just because a technology is available, doesn't mean we should pursue it – the jobs argument could be proposed equally for opening new nuclear power plants, although these are not in favor since the various nuclear plant accidents over the last few decades. Thank you for this opportunity to offer input.

Submission Number: ***TRANS-LV-M1-00042***

Received: 5/24/2016 12:00:00 AM
Commenter: Marilyn Sewell
Organization: Administer Emerita, First Unitarian Church
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. My name is Marilyn Sewell, and I'm the Administer Emerita of the First Unitarian Church of Portland, Oregon. Since I'm a minister, I will speak from a the moral perspective. Last Sunday I went to a memorial service. The deceased was a popular figure, a man of wealth and influence, but not one of the many speakers that day alluded to the dead man's generosity. Not one person said that he was the kind of man who did the right thing when the right thing was unpopular. No, he was all about going along to get along. And you know what, not a single tear was shed amongst the 300 persons present that day. It's like age. I understand all the more acutely that life is short. And all of us need to ask ourselves, what are we going to leave behind? You folks are in a position of power and authority today, and you have an opportunity to provide leadership in the most important moral issue of our time, or one might argue of any time. The fate of the planet is in the hands of our generation. We're into what biologists call the sixth mass extinction which threatens to eliminate 20 to 50 percent of all living species within this century. What about humans? As the coasts go underwater, which they will, 80 percent of the world and inhabitants that live on the coast will the forced inland in a migration process that will make the current European situation seem like child's play. What we do now will not prevent calamity but it will keep the worst from happening, and it can. And so today I ask you simply to do the right thing. There is no real confusion about that. You will look back sometime in the not so distant future and you'll have to answer the question -- and for that matter all of us will -- how did I act when the chips were down?

Submission Number: ***MBTL-SEPA-DEIS-0002935***

Received: 6/13/2016 3:20:44 PM
Commenter: Patricia Shadden
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***TRANS-SPOKANE-M2-00013***

Received: 5/26/2016 12:00:00 AM
Commenter: Patty Shadden
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. My name is Patty Shadden. I'm here to remind you that coal is already in our environment. It is of the earth. It's one of the minerals that already exists in our environment and we don't need to be afraid of it.

Ninety-three million people have given up looking for employment in this society. We need the opportunities that this Millennium Bulk Terminal project affords.

I'd like to share some personal facts of the impact we talk about, and impact. Seven of my seven children that were raised here in Spokane sought education in states whose higher education was supplemented by the coal industry.

The state of Wyoming, Laramie Casper, both of those cities contribute to education in those states. And my children were able to afford education in those states.

I would like to see the state of Washington benefit from something like this Millennium Bulk Terminal project. The dine dinosaurs know that cars and railcars aren't the only thing that causes climate change. They can attest to the fact that they're not here today. That let's you know that the environment itself provides changes in climate way more than human beings do.

Beautiful America is a city that we've passed through many times. We lived in Wyoming for years and then moved here to Spokane. I trust the technology and also the EIS studies that the panel has done to keep this manageable, safe, healthy and to afford our youth the opportunity move back to the state of Washington for good paying jobs.

Thank you, and I support this project wholeheartedly.

Submission Number: ***MBTL-SEPA-DEIS-0002874***

Received: 6/13/2016 2:56:56 PM
Commenter: Scott Shagool
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003093***

Received: 6/13/2016 5:25:00 PM
Commenter: Scott Shagool
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0000017***

Received: 4/30/2016 8:36:11 AM
Commenter: Julia Shaida
Organization:
State: New York

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

We have no time to spare as a society to decrease our use of fossil fuels. The construction of this terminal will bring short-term economic benefit and stymied progress toward a livable future. Stop this for the future of the children of Washington.

Submission Number: ***TRANS-PASCO-M2-00045***

Received: 6/2/2016 12:00:00 AM
Commenter: Shandra
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity today. My name is Shandra. I moved to Richland for for a job, and it has nothing to do with the coal industry. I was really excited to move to Washington because I thought I was getting away from all this dirty energy and fossil fuel, coal-fire powered plants. I moved from coal country in the south where the Ohio River is lined with coal particles. I have smelled the air around these areas, I have talked to nurses at nearby hospitals who see firsthand the adverse effects of coal pollution.

I oppose the Longview coal terminal. It is counterproductive to the efforts this country is making in reducing our carbon footprint. Climate change is a global crisis.

If we support the legislation of the clean power plan, then here is an opportunity to walk the talk, to live by example. Coal mines in the U.S. are closing, coal-fired power plants are shutting down, jobs in renewable energy are thriving. I hope we can continue to support this path of transitioning to clean, renewable energy. Thank you so much.

Submission Number: ***TRANS-SPOKANE-M1-00072***

Received: 5/26/2016 12:00:00 AM
Commenter: Shane
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. My name is Shane. I live near Sandpoint, Idaho.

The Draft Environmental Impact Statement for the Millennium Bulk Terminals proposal completely ignores the grave consequences increased train traffic would have on me, my community, and all of the other cities and towns and residents outside of Washington State.

From the extra train noise, diesel exhaust, and coal dust, I'd have to deal with as I ride my bicycle into town to the ambulance delayed by coal trains that might not reach the stroke victim in time to the baby woken in the night by a 125-car coal train shaking the house.

This terminal is a bad idea for Sandpoint and dozens of other rail side communities in Idaho, Montana, and beyond.

An employer of thieves could claim job creation as a benefit of their enterprise. Likewise the 135 full-time jobs this coal terminal would create would come at great cost. Millennium proposes to diminish our quality of life, to rob our communities of quiet and safety, and to steal from my peers and my children-to-be and myself the hope of life unencumbered by out of control climate change. We can have family-wage jobs without jeopardizing families across the globe.

The Draft EIS doesn't consider the impacts of mercury pollution out of Washington State, yet it acknowledges the atmospheric marketing examination is a global problem. Are our contaminated fish and children with learning disabilities unimportant if they're outside the borders of Washington?

This proposal and its implications are a global concern and they deserve global consideration. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0001813***

Received: 6/2/2016 5:28:20 PM
Commenter: John Shangin
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Here are my comments on the Millennium coal export terminal. I support the project and the jobs and tax revenues it will provide. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed Millennium Bulk Terminal would provide. The project would create work right away during construction, and plenty more jobs would stay around to run the terminal. Plus, all of those wages generated would trickle back into our local and state economies. At a time when our state unemployment rates are below the national average, we cannot miss big opportunities for new business like this one. The opening of Millennium Bulk Terminals proposed coal export facility will have a significantly positive impact not only on the state of Washington but the entire country. So I not only urge you to keep this permitting process moving forward at an efficient pace, but to also to accept the DEIS as sufficient. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000411***

Received: 5/17/2016 6:29:35 PM
Commenter: Robert Shank
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview's quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. It is important that regulatory agencies keep the playing field level by being fair and consistent. The permitting process for this coal export terminal should be similar to other export terminals.

Submission Number: ***MBTL-SEPA-DEIS-0000807***

Received: 5/23/2016 6:59:19 PM
Commenter: Alice Shapiro
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate that our public agencies require public comment. Members of agencies, such as yourselves are also affected--you are also part of the public. We, our children and grandchildren and all generations to come will be left with the detrimental effects of unwise and archaic decisions made by public agencies. The applicants to this bulk oil shipping terminal are primarily interested in making a profit from shipping their fossil fuels to whomever will buy them. The use of their fossil fuel products has been curtailed in many parts of the world and it is very probable that the uses of their products will be further curtailed. Market prices have suffered accordingly. At what point do these corporations decide that they can no longer afford to do business and file for bankruptcy? If this terminal is approved and constructed, how long will it be in use after build out before Millenium and its partners are forced to file for bankruptcy because of inability or refusal to diversify their product line to include clean renewable energy sources. When this time comes, who will clean up their mess and who will bear the tremendous cost of clean up and restoration? Are they being charged a cleanup bond? Are they being taxed accordingly so cleanup can come from these funds? I doubt it. The same public that is commenting and urging you to not approve this application will be paying for cleaning up their mess and suffering the unhealthful effects of this project. It is wise for you to avoid this mess from happening just to supply a few unsustainable jobs promised for your area. The entire Columbia Valley may potentially suffer because of your decision. Please do not approve this application on the grounds that it is unsustainable for this area.

Submission Number: ***MBTL-SEPA-DEIS-0000175***

Received: 5/9/2016 3:24:32 PM
Commenter: Beppie Shapiro
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I object to the conclusions of this EIS. Specifically: 1. Climate change a. the emissions from rail and ship transport will add dramatically to carbon emissions, with predictable and costly impacts to sea level rise and climate change. b. DEIS assumes that exporting coal will raise the cost of domestic coal and thus discourage coal consumption. However, with many states and communities limiting or even stopping the use of coal, the assumed effect is unlikely. In fact, burning this coal elsewhere in the world will deprive the US states and communities which are limiting the use of coal in order to keep air cleaner and limit climate change, of the benefits of their policy changes. Burning coal will cause air pollution which we know travels across the Pacific to land in Hawaii and the Northwest. Burning this exported coal will increase the severity of climate change, just as US states and communities are realizing the gravity of impacts they will experience, and trying to keep emissions from fossil fuels as low as possible. 2. The noise from train passage, stopping and starting, and whistles will as the DEIS demonstrates exceed regulations for inhabitants of hundreds of homes and probably many workplaces. The effects of loud noise on public health have been acknowledged for decades; yet the DEIS does not consider these effects seriously enough. 3. Coal dust, considered as not having a major impact in the DEIS, on the contrary is likely to have major impacts on people, especially though not only on those with respiratory issues, and on agriculture along tracks. The EIS needs to consider effects seen with rail transport of coal and take account of its impact on Washington and other states. Thank you. Beppie Shapiro

Submission Number: ***MBTL-SEPA-DEIS-0000672***

Received: 5/22/2016 8:24:17 PM
Commenter: Howard Shapiro
Organization: Sierra Club
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I apprecuate that our public agencies require public comment. These are not to be taken lightly because we and our children are the people that are left with the detrimental effects of unwilse decisions made by public agencies. The applicants to this bulk oil shipping terminal are primarily interested in making a profit off of shipping their fossil fuels to whoever will buy them. The use of their fossil fuel products has been curtailed in many parts of the world and it is very probable that the uses of their products will be further curtailed. Their market prices have suffered accordingly. At what point do these corporations decide that they can no longer afford to do business and file for bankruptcy? If this terminal is approved and constructed, how long will it be in use after build out before Millenium and it's partners are forced to file for bankruptcy because of their inability or refusal to diverfsify their product line to include clean renewable energy sources. When this time comes, who will clean up their mess and who will bear the tremendous cost of clean up and restoration? Are they being charged a cleanup bond? Are they being taxed accordingly so cleanup can come from these funds? Of course not. The same public that is commenting and urging you to not approve this application will be paying for cleaning up their mess and suffering the unhealthy effects of this project. It is wise for you to avoid this mess from happening just to supply a few unsustainable jobs promised for your area. The entire Columbia Valley may potentially suffer because of your decision. Please do not approve this application on the grounds that it is unsustainable for this area.

Submission Number: ***TRANS-LV-Q1-00057***

Received: 5/24/2016 12:00:00 AM
Commenter: Howard Shapiro
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Howard Shapiro, S-H-A-P-I-R-O, Portland, Oregon. I'm concerned that in view of the fact that the coal market is dwindling, several coal companies have filed for bankruptcy and this proposal is for the largest coal export terminal in the U.S., I guess. With the market dwindling and the coal companies going bankrupt, if this Millennium goes down, who is going to be stuck with cleaning up this huge mountain of coal and the terminal, the mess that they leave? Cleaning up the river, the polluted water, cleaning up the Earth, the environment, are the taxpayers going to be paying for that? Is there a bonding process that is part of this DEIS? Are they required to pay a bond, cleanup bond, in the event that a cleanup is necessary. I know they say it's going to be clean and so on but, I mean, they say -- they've told us that shipping coal by rail is safe, and we just had a derailment in Iowa along the banks of the Mississippi of a coal train and the coal spilled all over the place. That could happen right here in Longview, and it could result in fire which, again, would wipe out Longview. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000267***

Received: 5/10/2016 6:28:01 PM
Commenter: Dyarle Sharkey
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. I'll look forward to updates.

Submission Number: ***TRANS-LV-Q1-00023***

Received: 5/24/2016 12:00:00 AM
Commenter: Elaine Sharpe
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Elaine Sharpe, Longview, Washington. I am asking for a no-action alternative to the coal export in Longview, Washington. There are too many unsure environmental issues to proceed with this project. One, coal dust, a little is too much. Two, what is this surfactant for the coal cars and who really knows how clean it can become to enter the Columbia River? Reports say it will be 85 percent but 100 percent is needed. Three, increased ships on the Columbia River make a great risk to fish and wildlife in and along the river. Four, 44 million tons of coal equals 90 million tons of emissions and that's only for one year. Five, coal companies are declaring bankruptcy. Millennium is not on solid ground financially. If it starts this project and declares bankruptcy, it can walk away with no cleanup. Who will be responsible for a giant pile of coal not being watered down, in quotes, and blowing in the wind. Six, Mobile, Alabama experienced impacts from coal dust even though all of the studies were approved before the terminal was built. You cannot remove coal dust once there, it only accumulates. There are too many devastating environmental impacts to allow this coal export terminal. No-action alternative is the logical decision for this project.

SHAVER
TRANSPORTATION COMPANY

May 24, 2016

Hello, my name is Rob Rich and I represent Shaver Transportation Company. We are a 5th generation family owned tug and barge company that has been safely assisting ships for 136 years on our river system. Many of our crew members live here in Longview.

We fully support the approval of this facility on many fronts. Beyond the jobs, the security, the benefits to the city and county, this is a great opportunity for not only our vital maritime industry, but for

This brand new facility, being built to the highest standards of safety and construction, will have undergone one of the most rigorous planning and siting processes in the nation. The permitting and regulatory bodies in place to review and guide this process ensure the safest facility possible. Longview will have the safest and most environmentally responsible terminal of its type in the U.S.

The Columbia River system already has the capacity in place today for this terminal and its vessels. The peak of ship calls on the Columbia River Port system was 2200 vessels in the late 90's. Currently about 1400 vessels annually call our system. These vessels are served by more Pilots, Tugs, Response Equipment and Providers than we had then. Our system and its safeguards are ready today.

There will always be an opportunity to say no. It is frankly the easiest thing to say in some instances. As we educate ourselves on the operation, regulation, and value to our community, its families, the maritime community and its families, we see and support this great opportunity.

We at Shaver Transportation fully support this project and its value to our region.

Sincerely,

Robert D. Rich, V.P. Marine Services, Shaver Transportation Company.

ISM Certified
4900 N.W. Front Avenue • Portland, OR 97210-1104 • P.O. Box 10324 • Portland, Oregon 97296-0324
Office (503) 228-8850 • Toll Free (888) 228-8850 • Dispatch (503) 228-8847 • FAX (503) 274-7098

RESPONSIBLE CARRIER PROGRAM

Submission Number: ***TRANS-LV-M1-00009***

Received: 5/24/2016 12:00:00 AM
Commenter: Rob Rich
Organization: Shaver Transportation Company
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

You bet. Thank you very much. My name is Rob Rich, I'm with Shaver Transportation company. We're one of the tug and barge lines that serve the Columbia River, and I'll speak generally about shipping operation here on the Columbia River in my remarks. We're a fifth-generation family-owned tug and barge line, 136-year-old family-owned company, as I mentioned, and many of our employees live and work here in Cowlitz County and Longview. We fully support the approval of this facility on many fronts. Beyond the jobs, the security, the benefits to the City and County, this is a great opportunity for our vital maritime industry. This brand of new facility, being built to the highest standards of safety and construction will have underdone one of the most rigorous planning and siting processes in the nation. The permitting and regulatory bodies in place currently to review and guide this process ensure the safest possible facility. Longview will have the most environmentally responsible of this type in the United States. The Columbia River system already has the capacity in place today for its terminal and its vessels. The peak of ship calls in the Columbia River Port system was about 2200 vessels in the late 1990s. That's 2200 ships calling Ports of Longview, Kalama, Portland, Vancouver, into Astoria. Currently there are about 1400 vessels annually in our system. Just to get up to what the peak was in the late '90s -- the peak -- not being the limit, just the peak -- is another nearly 800 ships. These vessels are served today by more pilots, more tugs, more response equipment, and more providers than we had then. Our system and its safeguards are ready today. We at Shaver Transportation fully support this project and its value to our region. Thank you for this opportunity.

Submission Number: ***MBTL-SEPA-DEIS-0002373***

Received: 6/9/2016 5:56:00 PM
Commenter: Steve Shaver
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. Ultimately, global warming and the impact of fossil fuels on the environment are national government and international government issues and did not need to be studied in this DEIS. Now that it's done, let's move on to the final EIS! Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Shaw, Lori (2280)

Submission Number: ***MBTL-SEPA-DEIS-0002280***

Received: 6/9/2016 4:49:24 PM
Commenter: Lori Shaw
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I am another person from Colstrip, MT that supports the Millennium Bulk Terminal project in Longview. Please let this project move forward!

Submission Number: ***TRANS-SPOKANE-M1-00023***

Received: 5/26/2016 12:00:00 AM
Commenter: Lori Shaw
Organization: Colstrip United
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
SPEAKER 23: Hi. My name is Lori Shaw. I'm from Colstrip, Montana, and I am a cofounder of Colstrip United.

I'm here to voice support for the Millennium Bulk Terminals in Longview, Washington. The Millennium would have positive consequences that will reverberate far beyond the borders of Washington State.

Supporting this project will provide critical economic opportunities for both local communities in this state as well as other states like Montana and Wyoming.

Olympia needs to let the Millennium Bulk Terminals move forward. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001112***

Received: 5/24/2016 7:30:35 PM
Commenter: Walter Shaw
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the agencies offering this opportunity to comment on Millennium Bulk Terminals DEIS. The port at Longview will bring many good paying jobs to Washington and will encourage the development of our natural resources nationwide, helping to lift us out of our current nationwide economic depression. Ultimately, global warming and the impact of fossil fuels on the environment are national government and international government issues and did not need to be studied in this DEIS. Now that it's done, let's move on to the final EIS! The opening of Millennium Bulk Terminals proposed coal export facility will have a significantly positive impact not only on the state of Washington but the entire country. So I not only urge you to keep this permitting process moving forward at an efficient pace, but to also to accept the DEIS as sufficient. Thank you.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☐ Greenhouse Gas
- ☐ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☒ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

Walter Shaw, Colstrip MT –

My main purpose in supporting the Millennium Bulk Terminal is jobs, and the support of human growth/life. This terminal would provide much needed jobs for [redacted] the U.S. These are jobs families need to survive.

The tax revenue from both the companies

(additional space is provided on the back)

(comment continued)

that make money from this terminal and the increased personal Income tax from the families getting jobs from this project will benefit this whole state and the nation.

[redacted]

Submission Number: ***TRANS-LV-Q1-00060***

Received: 5/24/2016 12:00:00 AM
Commenter: Shawn
Organization: Greenpeace
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Shawn. I coordinate campaigns for Greenpeace. My concern with the Draft Environmental Impact Statement is that is doesn't adequately represent all of the economic issues associated with the terminal. Specifically it doesn't list the jobs that will be created in the medical sector of Longview. You know, I'm a medical assistant personally and I know that COPD could be huge business for Longview. So I think building the terminal would create a lot of need for a lot of medical infrastructure to take care of the longshoremen who are sick, and I think those are definitely jobs. I think another economic obstacle or barrier to the successful viability of the terminal is that, you know, it doesn't really -- the DEIS doesn't really account for the effect of opposition groups. Having worked for an opposition group, you know, we've heard recently fossil fuel companies have admitted that opposition groups are one of the greatest obstacles that they have for future viability and, as a member of one of those opposition groups, I'm not only flattered but really deeply concerned. We're not going to let any more leases happen? They're all going to dry up because we shut them down, and there's not going to be enough coal to put in the coal trains to bring over here. So it creates a huge problem because there won't be enough access to coal once we keep it in the ground and then all of the people who really want to work at a coal terminal won't really have anything to export. So those are my two main thoughts. We're living in the last 60 days of the Great Barrier Reef according to scientists. Ninety-four percent of scientists say that our kids won't know what coral looks or what crustaceans look like, and I'm afraid they might not know what Longview looks like either. So I'm urging all responsible parties to vote no on the proposed terminal.

Submission Number: ***MBTL-SEPA-DEIS-0000145***

Received: 5/9/2016 1:14:46 PM
Commenter: Mitchell Shea
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I’m glad to have the chance to make a comment about this project as it’s very important to me. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State’s role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. And I'm happy to learn that the facility will not be used as a shipping transit for coal, natural gas and petroleum. We need to actively support sustainable energy production and it''s good to know that Millennium Bulk Terminals won't be facilitating transportation of fossil fuels. Way to go, guys!

Submission Number: ***MBTL-SEPA-DEIS-0001060***

Received: 5/24/2016 6:46:22 PM
Commenter: William Sheard
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0000671***

Received: 5/22/2016 6:57:34 PM
Commenter: Dave Shelman
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

We strongly urge that the DOE acknowledge the full adverse impacts of this project to the Columbia River Gorge National Scenic Area (CRGNSA). These potential adverse impacts are identified at various sections of the Draft EIS, but do not fully document the effects of the daily rail operations to the CRGNSA even under “safe” operational conditions. The MBTL is a linear development because it depends on coal to be brought in by train. Consequently, the impact of this project stretches from the coal mines to the MBTL. The EIS may not adequately consider the impacts to communities and natural resources along this entire linear development. Nowhere will these impacts be more concentrated than in the Columbia River Gorge, eighty miles of which pass through the National Scenic Area. The NSA designation was made federal law by act of Congress in 1986, in recognition of the spectacular natural beauty of this area. The Act charged the U.S. Forest Service, the states of Washington and Oregon, local counties and a special Gorge Commission with protecting it from developments that would diminish the qualities that led to its NSA designation. This proposal hinges on the use of both the BNSF and UP lines with up to eight more loaded trains per day passing through the NSA. If any other development included similar adverse impacts to the NSA the law gives grounds for rejection. Current protections that the NSA rules provide will be compromised. Beautiful natural sites that now attract millions of tourists will become unsuitable due to noise, air and visual pollution. This will be the case even if no environmental accidents occur, which the Draft EIS concludes are inevitable. In our view, the EIS needs to be more explicit about the adverse impacts to the CRGNSA.

Submission Number: ***MBTL-SEPA-DEIS-0001220***

Received: 5/26/2016 6:01:37 PM
Commenter: Nichole Shepard
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. The economy depends on trade. It creates jobs working the railroads and ships, loading cargo at the ports, growing crops for export, and building the infrastructure necessary to support a trade-based economy. However, trade depends on permitting approval to construct this infrastructure. If the federal, state, or local government apply different permitting standards to projects exporting coal, they are creating a dangerous precedent that will make it hard to build new infrastructure needed to export other goods, like wheat or manufactured products. The environmental groups have a long history of challenging trade based projects in the northwest, such as Columbia river dredging, new rail facilities and/or export terminals. Governments shouldn’t threaten trade or the jobs that depend on it.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statem

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- [ ] Vessel Transportation
- [ ] Vehicle Transportation
- [x] Coal Dust
- [x] Greenhouse Gas
- [x] Climate Change
- [x] Plants and Animals
- [ ] Marine Species, Fish, or Fisheries
- [x] Wetlands or Streams
- [x] Water Quality
- [ ] EIS Regulatory Process
- [ ] Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

My husband and I, Timm + Marie Shepard, live in Cheney, WA; we also have a family of 3 horses and 3 cats.
We live accross a rail road track. Cheney is home to EWU. Coal and oil trains go through Cheney; and already create serious back ups of cars in town at several crossings. They cut off several homes from

(additional space is provided on the back)

(comment continued)

quick access to fire and emergency vehicles.
More trains will make Cheney uninhabitable.
I feel as if we are turning our beautiful state of Washington into China, poor air quality, no care for the environment, the farmers, the people who live here.
Last fall they did upgrade work on the track across from us. They stored over 3,500 railroad ties for several months - Sept thru Dec.
Every morning when I went to feed the horses, I had an immediate headache. Within a period of 5 weeks I had unexplained bouts of high fever (101.8) and chills, flu like symptoms but I saw a pattern they happened when the wind was blowing from the railroad tracks. I started avoiding going outside after checking certain wind directions and on hot days and I had to stop riding my horse. Glands in her neck (my horse) got swollen. My wonderful little farm became a hell. This warm fall, came after a hot summer and extreme poor air quality due to fires in the Wenatchee, Twisp area.
The climate IS changing, the air IS polluted by humans, our actions have an impact.
How can we justify allowing companies to have short-term profits on the back of the rest of the citizens and our children and animals.
My bad experience with the track repairs is small, in comparison to the extreme damage awaiting us if we allow such bad decisions to be made. Do not allow a coal terminal and coal trains and coal mines. This is NOT the future we want.

Thank you
Marie Shepard

Submission Number: ***MBTL-SEPA-DEIS-0000771***

Received: 5/23/2016 2:12:31 PM
Commenter: Austin Shepherd
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. Millennium has helped clean up the old Reynolds facility and the Columbia River. The old industrial site had degraded water quality and fish habitats on the river. Millennium has completely turned this around. Millennium has demonstrated a commitment to do everything in its power to contribute to the well-being of the community and local environment. If you ask people in Longview what they think of Millennium, they will tell you they are a good neighbor, good employer and responsible steward of our environment. Coal is plentiful and tecnology has caused it to be clean and safe. It is also very cost effective so approve the project please. Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

Submission Number: ***MBTL-SEPA-DEIS-0001837***

Received: 6/2/2016 5:51:56 PM
Commenter: Gregory Shepherd
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview's quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage?

Submission Number: ***MBTL-SEPA-DEIS-0002323***

Received: 6/9/2016 5:17:45 PM
Commenter: Ryan Sherman
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. MBT has received a thorough and comprehensive draft EIS review one five years in the making. If we don't take the next step forward and turn this vision into a reality, it's going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003361***

Received: 6/13/2016 10:15:35 PM
Commenter: Deejah and Ron Sherman-Peterson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

We urge you to deny allowing the Millennium Bulk Terminals export facility in Longview, Washington. This facility will not benefit Washington and its residents. On the contrary, it will cause more pollution, disease, harm to wildlife, and increased global warming. (Sightline's series: A Crackdown on Coal Dust at http://www.sightline.org/series/coal-dust-crackdown/). On the economic side, coal companies are going bankrupt and only one company remains in this proposal. It does not make financial sense to proceed with building this terminal. And who will pay for the cleanup—if it can even be done—that will certainly be needed at some time in the future, especially if this company also declares bankruptcy? But most important is our responsibility to protect life on this Earth. We can no longer support fossil-fuel dependency that is destroying the life-support systems on this planet. We have a moral obligation to stop this insanity now.

Submission Number: ***MBTL-SEPA-DEIS-0002595***

Received: 6/13/2016 10:49:22 AM
Commenter: Randal Sherrer
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002052***

Received: 6/7/2016 6:43:39 AM
Commenter: John Sherwin
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am very concerned about this project. At a time when we should be ramping down coal infrastructure and moving as quickly as possible to a fossil-fuel free energy system, this project poses numerous risks and will no doubt exacerbate climate change chaos. In addition, I am very concerned about pollution produced by the extraction, transport and combustion of the coal. Please do not approve this project.

Submission Number: ***MBTL-SEPA-DEIS-0001184***

Received: 5/25/2016 8:52:29 PM
Commenter: Stacey Sherwin
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I oppose the construction of a coal terminal in Longview, Washington, or construction of any other terminal designed to export coal to China. The health risks to my community (Missoula, Montana) and other communities along the train track, as well as additional exposure to noise and congestion caused by the number of additional trains that would be added, will seriously degrade the health and wellness of citizens. Additionally, construction of an expensive terminal is likely to be outdated by the time it is finished, as coal-based energy is not environmentally or economically sound.

Submission Number: ***MBTL-SEPA-DEIS-0003053***

Received: 6/13/2016 5:06:51 PM
Commenter: Eric Shew
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Here are my comments on the Millennium coal export terminal. I support the project and the jobs and tax revenues it will provide. In Longview, 56% of kids need free and reduced price lunch at schools and go home to neighborhoods facing 8% unemployment. We cannot afford to look the other way when projects in this area guarantee new jobs and private investment in our schools, roads, and local services. In fact, the estimated number of jobs related to construction activity at the Millennium Bulk Terminals project is 1,350 temporary direct jobs - that will mean $70 million in direct wages! When the project is completed there will be about 135 direct jobs and about 165 indirect jobs. These numbers simply cannot be ignored. Remember this project's economic benefits to the local community. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you. Sincerely, Eric Shew ericshew@gmail.com 98632

Submission Number: ***MBTL-SEPA-DEIS-0003351***

Received: 6/13/2016 9:28:22 PM
Commenter: Bill Shibley
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0002648***

Received: 6/13/2016 12:16:17 PM
Commenter: Jeanelle Shields
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing in opposition for a proposed coal export terminal at the site of the former Reynolds Aluminum smelter, in Cowlitz County. Sandpoint and surrounding communities have rail links that make us particularly vulnerable to derailment mishaps. The recent derailment at Mosier, Or. that was caused by a relatively minor mechanical failure underscores the potential seriousness of a true unmitigated disaster that awaits our community. In addition to polluting the Pend Oreille Lake, which is our drinking water and our major source of tourism dollars, little is mentioned of the disaster a fire would inflict on our forests. The rail lines run along mountains that, due to their steepness would cause uncontrollable fires. Our natural resources are a major tourism draw. A train derailment would have unimaginable and unprecedented financial impacts in our community for years. Such a terminal benefits a few while imposing egregious risks on many. Please vote no on this proposal.

Submission Number: ***MBTL-SEPA-DEIS-0000160***

Received: 5/9/2016 1:46:37 PM
Commenter: Gordon Shinkle
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0001285***

Received: 5/26/2016 6:39:51 PM
Commenter: Charles Shipley
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Regulators have been looking at this project for years, and it's time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments it's time to let it. This project will create additional revenue for a state that, like many others, can really use the economic boost. Through the entire construction process it will employ a significant amount of people and go a long way toward revitalizing Washington. I feel we should make this coal export terminal a reality. Thank you for considering my comments.

Submission Number: ***MBTL-SEPA-DEIS-0000224***

Received: 5/10/2016 5:06:16 PM
Commenter: Paul Shipman
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. Millennium has helped clean up the old Reynolds facility and the Columbia River. The old industrial site had degraded water quality and fish habitats on the river. Millennium has completely turned this around. Millennium has demonstrated a commitment to do everything in its power to contribute to the well-being of the community and local environment. If you ask people in Longview what they think of Millennium, they will tell you they are a good neighbor, good employer and responsible steward of our environment. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0001497***

Received: 5/31/2016 1:45:01 PM
Commenter: Denise Shirley
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

What would really be nice is if our governor would stop playing games and get rid of the EPA, which is costing thousands of oil and coal jobs. He has the power to do so and from what I understand he does nothing, because he wants a judgeship somewhere. It is time to clean house.Wyoming has some of the cleanest burning coal. Why is he not fighting for his state, isn't that his job? Sincerely, Denise Shirley Leavinthescene@yahoo.com 82414

Submission Number: ***MBTL-SEPA-DEIS-0002693***

Received: 6/13/2016 1:11:08 PM
Commenter: Austin Shoemake
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002690***

Received: 6/13/2016 1:09:13 PM
Commenter: Jeralyn Shoemake
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002629***

Received: 6/13/2016 11:46:47 AM
Commenter: Ken Shoemake
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002694***

Received: 6/13/2016 1:12:41 PM
Commenter: McKenzie Shoemake
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☒ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☒ Coal Dust
- ☐ Greenhouse Gas
- ☒ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

I live in Camas, Washington. The rail tracks are very close to the downtown area. Noise from passing trains and a whistle at one at-grade crossing is already annoying. An increase of 16 trains per day will significantly degrade our quality of life and the town's charm. Increasing Dust will sully the downtown and nearby neighborhoods. Neighboring town of Washougal has multiple at-grade crossings and will be severely impacted by traffic delays

(additional space is provided on the back)

(comment continued)

Worse than any local impacts, the increase in greenhouse gas emissions caused by all the coal exported to Asia - and further increase due to a lower price for coal globally - will further exacerbate the challenge we already face with Climate Change.

Warren Shoemaker
Camas, WA

Submission Number: ***MBTL-SEPA-DEIS-0001671***

Received: 5/31/2016 6:33:23 PM
Commenter: Keith Short
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study should move forward in a timely manner. Please allow me to provide my comments in regards to the draft EIS. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don’t hold them up any longer.

Submission Number: ***MBTL-SEPA-DEIS-0002973***

Received: 6/13/2016 3:44:36 PM
Commenter: Roger Short
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***TRANS-SPOKANE-M1-00028***

Received: 5/26/2016 12:00:00 AM
Commenter: Vic Short
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Hello. My name is Vic Short. I'm from Stevens County just up north.

After reviewing this issue, a phrase from Ronald Reagan comes to my mind. The nine most feared words in the English language are, I'm from the government and I'm here to help.

My biggest concern -- there have been a lot of issues talked about today. My biggest concern after reviewing this EIS is that it can become a political weapon. Whether you're on the left or the right, it can be used for your political benefit. That is a danger we cannot allow our government to achieve. We must be fair to everyone.

If we don't require this standard for other businesses and industries in the state, why are we giving this one entity (inaudible) standing. It's not fair, it is not the American way. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001924***

Received: 6/5/2016 11:41:48 AM
Commenter: William Shoutis
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am opposed to the construction of a bulk terminal at Longview, because I live in Livingston, Montana, one of the windiest places in the western U.S., and I don't believe any amount of surfactant can keep the dust on those piles of coal in open cars in our winds. My children play in a schoolyard that is 200 yards from where the trains pass, and there is more potential for air quality issues on that schoolyard as train traffic increases. The city of Livingston is also at risk for air quality issues due to blowing coal dust, and I would like to see more study done on coal trains traveling through exceptionally windy areas. There is no benefit to the town of Livingston, but only impacts that could affect our children for years to come.

Submission Number: ***MBTL-SEPA-DEIS-0000754***

Received: 5/23/2016 1:59:34 PM
Commenter: Joseph Shubert
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it’s time Longview went back to work. Enough with the schedule delays, bring this process to a close.

From: Placido, Elaine <PlacidoE@co.cowlitz.wa.us>
Sent: Monday, June 06, 2016 10:41 AM
To: Pace, Erin
Subject: FW: Millenium Coal Terminal

Comment attached.

E. Elaine Placido, DPA
Director, Building & Planning
207 Fourth Avenue North
Kelso, WA
placidoe@co.cowltiz.wa.us
Office – 360-577-3052 ext 6662
Cell – 360-703-1462
Fax – 360-414-5550

From: John Shue [mailto:jonnyshue@gmail.com]
Sent: Thursday, May 26, 2016 11:34 AM
To: Placido, Elaine; Bischoff, Chris; cpl@dnr.wa.gov
Subject: Millenium Coal Terminal

Commissioner Goldmark and Cowlitz County,

Hello there, My name is Johnny Shue. I'm an Oregonian of 38 years living in Seaside, OR. I'm writing to express my opposition to the Millennium coal terminal and any coal or gas export terminal in our region.

My major concerns are for the environment: the health of the flora, fauna and fish in the Columbia river corridor. And the health of the families and communities in that region. Another of my greatest concerns is for the health of America. I am morally opposed to an Australian corporation shipping American coal to Asia. Dirtying up and poisoning our rivers and communities while the profits and the coal go overseas. Just like the proposed LNG terminals, this sounds like the fast track to raping America of her resources while Americans settle in to being treated like a third world country.

Let's not forget those upriver and downriver from us. In the recent article in Longview's "The Daily News" about the hearing a gentleman from Montana had come to voice his concerns for the health of his family and community and their rights to clean water. Coal mining and moving is very dirty business and bringing this harm on our fellow Americans (or fellow world citizens) is not justifiable, especially for an offshore corporation to ship our coal offshore!

My time for today is up while my list of objections to this project is still long. Taking global warming seriously, leaving fossil fuels in the ground and supporting green technologies is another letter in itself.

I sincerely hope that you will side with reason and reject the Milenium, and any other Fossil fuel export.

Thank you for your time and open mind,

Sincerely,

Johnnny Shue

Submission Number: ***MBTL-SEPA-DEIS-0000425***

Received: 5/17/2016 6:46:29 PM
Commenter: Kenneth Shuster
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It's about time! There might not be many who know how much coal is used in everyday occurrences, but for those who do, know Millennium's project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both. Thanks for reading my comments.

Submission Number: ***MBTL-SEPA-DEIS-0001954***

Received: 6/6/2016 2:05:58 PM
Commenter: Grace Sickler
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The proposed coal export terminal at Longview should be approved. Millennium Bulk Terminals has a clear and environmentally-sound plan that will be studied to make this port a reality and it will do much to contribute to the economy and vitality of the region and the country. This draft EIS is exhaustive and quite frankly, overreaching. For instance, because the proposal is a terminal proposal, the use of the bulk commodity by a third party is a superseding and intervening cause to the combustion of coal. As a result of these superseding causes, the construction and operation of the terminal is not a proximate cause of the combustion of coal. Enough already! Thank you for taking my comment and for providing the opportunity to weigh in. I believe strongly in this project and hope that you will consider the strong commitment Millennium has made to restoring and protecting the environment in our community.

Submission Number: ***MBTL-SEPA-DEIS-0001567***

Received: 5/31/2016 5:14:13 PM
Commenter: Monica Sidener
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. In Longview, 56% of kids need free and reduced price lunch at schools and go home to neighborhoods facing 8% unemployment. We cannot afford to look the other way when projects in this area guarantee new jobs and private investment in our schools, roads, and local services. In fact, the estimated number of jobs related to construction activity at the Millennium Bulk Terminals project is 1,350 temporary direct jobs - that will mean $70 million in direct wages! When the project is completed there will be about 135 direct jobs and about 165 indirect jobs. These numbers simply cannot be ignored. Remember this project's economic benefits to the local community. I urge you not to be swayed by outside fanatics who do not care about our county or our people. The environmental review process for Millennium Bulk Terminals should be held to the same standard as every other port or infrastructure project. We have a very fair and comprehensive process in place, and I question the motives of those who say otherwise. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0003037***

Received: 6/13/2016 4:52:01 PM
Commenter: Mike Siegert
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold's site. They are an important part of our community and economy and will do even more great work once their permits are granted. Thank you for letting me submit my opinions and show my support for the project. Sincerely, Mike Siegert mikesiegert@yahoo.com 82716

Submission Number: ***MBTL-SEPA-DEIS-0001030***

Received: 5/24/2016 6:17:39 PM
Commenter: Cindy Siekierka
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing today to express my support for the Millennium Bulk Terminals project in Longview. I am glad for the opportunity to voice my support of this important project. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water â€" coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***TRANS-LV-M2-00042***

Received: 5/24/2016 12:00:00 AM
Commenter: Paul Siemens
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Paul Siemens (phonetic). I'm a consulting engineer, and I've worked in this town for 40 years mostly on Industrial Way where the facility is being proposed.

It should be obvious by now that burning coal is unacceptably destructive to our planet and air. There has never been a world wide scientific or political consensus stronger or broader than the one that now exists that CO2 emissions are causing climate change, ocean acidification and that they must be reduced quickly.

Given that, why on earth would you want to build additional coal infrastructure? Aside from the destructive effect that burning coal has on the environment and the oceans, burning coal is responsible for millions of premature deaths. Why? Knowing that, why on earth would we want to build additional coal infrastructure?

Domestic coal demand is way down and it will continue to decline. Most, if not all, major coal producers are in bankruptcy. The construction of renewable-based energy production is eclipsing hydrocarbon facilities here and worldwide.

Knowing that -- why on earth would you want to build additional coal infrastructure knowing what we know about coal's role in climate change, ocean change, and human respiratory disease coal export is environmentally irresponsible.

The train has left the station. This project is on the wrong side of history and we need to defer until a better project comes along.

Thank you.

Rosemary Brinson Siipola
PO Box 373 201 Elm Street
Kalama, Washington 98625
360-431-1363
rbsiipola@gmail.com

Testimony: Environmental Impact Statement
Millennium Bulk Terminals
Longview, Washington
May 24, 2016

My name is Rosemary Brinson Siipola and for nearly 20 years, I was responsible for the transportation planning for major infrastructure projects in the Longview-Kelso Metropolitan Planning Organization as the Transportation Planning Manager for the Cowlitz-Wahkiakum Council of Governments.

The SR 432 Corridor was studied and analyzed numerous times during my career at the COG. These included replacement of the Lewis and Clark Bridge, development of the Port of Longview industrial rail corridor, redevelopment and reconstruction of the Talley Way/SR 432/I-5 Interchange, and the capacity and signal improvements for the corridor between Columbia Blvd. and the intersection of SR 433/SR 432. All of these projects incrementally provided coordinated capacity improvements and modernization of the 1920's era truck and "choo choo" train transportation network.

The business and industry along the SR 432 Corridor, as it has developed from its infancy in the 1920's, is the base of the economy of Cowlitz County. The corridor, developed in the 1920's, needs to now support the economy of the 21st century. This is a golden opportunity for our region to develop a more balanced economy by coveting and improving the corridor to become a premier intermodal transportation network for the 21st century. The land use opportunities to compliment the transportation network need to be developed in the best way to create the most jobs, enhance every piston of our economic engine, which will result in a solid future for the region.

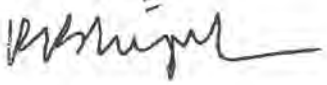
At times during the past 20 years, the volume of trucks along the corridor was second only to Royal Brougham in Seattle, which is one of main arterial access points into the Port of Seattle area. In other words, this is a very heavily-traveled, busy truck and rail arterial. I once asked the computer graphics staff at WSDOT to make a computer generated photograph of a chip truck going over the bridge into Longview Fibre, which was part of the Industrial Rail Corridor project. They came back with the photograph,which depicted a Frito-Lay truck heading to the cafeteria. In other words, we were mysterious. We had to work hard to get the state to understand the needs of our region and to pay attention to us.

The state has stepped forward on two major levels of support for the corridor and our future. First, the clean-up of the site will make available 400 acres of industrial land ready for development as a world-class intermodal terminal and manufacturing area, 35 miles closer to our international waters and trading partners. The second is the funding for improvements that will allow for the truck and rail volumes to run smoothly through the corridor, not impeding traffic for residents, tourists or business. This really is our region's golden opportunity to grab the ring for a sustainable future.

Allowing for this most valuable industrial site, probably in the whole state of Washington, and the entire west coast, to be overtaken by a facility that will only be in business for 50 years or less, only produces less than 150 jobs and takes up precious rail and truck infrastructure for a single commodity that has a shaky future, at best, seems to me to be short-sighted and a little desperate. We can, we must and we will do better.

Bringing our economy into the 21st century, after 30 years of treading water, will not be easy. The assets are in place to do this and we must take advantage of this opportunity to support future industry on this site that will bring a good number of family wage jobs, that will spin off real value-added employment opportunities, support the education and training of our residents and provide a better future for the citizens of Cowlitz County. The Millennium Bulk Terminal proposal does not do any of these things, nor does it support the efforts that the state has in play for us to develop a more sustainable future. I urge you to support the No Action Alternative.

Thank you.



Sillik, Traci (2336)

Submission Number: ***MBTL-SEPA-DEIS-0002336***

Received: 6/9/2016 5:27:32 PM
Commenter: Traci Sillik
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs and the proposed port at Longview will create much needed employment for hundreds of Americans. Please include my comments as part of the public response to Millennium Bulk Terminals plan. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. I sincerely appreciate the opportunity to submit these comments on the Draft EIS. Let's get this project moving forward so there are more good-paying jobs in the U.S.A.

Submission Number: ***TRANS-LV-M2-00115***

Received: 5/24/2016 12:00:00 AM
Commenter: Elyse Silloth
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thanks for sitting through all of this. You guys are great. Thank you for the work you do. I appreciate it. My name is Elyse Silloth (phonetic). I went to high school in Rainier, Oregon. I went to college in Longview at Lower Columbia College.

This is a big part of why I care about the environment is because I grew up in this beautiful area. And while it's beautiful, it's also Longview, Washington the home of a lot of environmental exploitation. So Department of Ecology, Cowlitz County on behalf of the community, not only for our climate, but for our kids I urge you to take the no action route on that coal export terminal.

After Lower Columbia College, I transferred to the University of California Berkeley where I got a degree in environmental science, policy and management. And I've worked on behalf of environmental justice issues in the Pacific Northwest and on the West Coast for the last six years.

When I lived in Rainier, it was very clear the messages that are sent to people there: You're not worth having healthy food. Longview is the only beacon of hope. It's the only grocery store near Rainier. Clatskanie has a Safeway, and it's extremely expensive, because that's how markets work. There's no other grocery store nearby.

This would double the amount of trains going into Longview which could hinder the access of grocery stores in Clatskanie and Rainier. We already know that one third of our global warming pollution comes in coal.

But this is a human health issue and food injustice as well. Coal is filled with particulate matter, mercury and arsenic among other federally recognized carcinogens which hinder brain development in our children.

Cowlitz is one of the highest counties with the highest rates of respiratory disease already in the state of Washington. Let's protect our children's lungs. Let's do solar energy in Longview.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000548***

Received: 5/19/2016 5:54:53 PM
Commenter: Pat Silva
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. This is an old industrial property being redeveloped. Keep the review to what is normal and factual.

Submission Number: ***TRANS-LV-M1-00065***

Received: 5/24/2016 12:00:00 AM
Commenter: Ben Silverman
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Ben Silverman. I live in Redmond, Washington, which I readily admit is not near here, and not even along the train route here. However, I do live in the path of the global climate crisis, because everyone does. This crisis threatens to destroy civilization in decades. Therefore, the movement I've heard of being talked about is transformation. The fact that a few -- that several dozen jobs may have to be replaced with different types of jobs -- and we're not talking about pot shops -- is just, you know, a small part of this. As was mentioned, renewable energy jobs, many more jobs are produced per dollar invested than in fossil fuels. And, let's see, I was also going to point out that the -- the long-term -- Okay, fine. I guess I needed to take notes. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001142***

Received: 5/25/2016 10:12:53 AM
Commenter: Catherine Simard
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
There is no more room for destructive substances in our environment. Coal is no longer necessary going forward. Please do not build this complex. Protect the mighty Columbia!

Submission Number: ***MBTL-SEPA-DEIS-0000472***

Received: 5/17/2016 7:46:34 PM
Commenter: David Simeoli
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm glad to have the chance to make a comment about this project as it's very important to me. Ultimately, global warming and the impact of fossil fuels on the environment are national government and international government issues and did not need to be studied in this DEIS. Now that it's done, let's move on to the final EIS! I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0001544***

Received: 5/31/2016 5:00:26 PM
Commenter: Jonna Simmons
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

There's no time like the present to support the draft study as it relates to the port at Longview. We need the economic boost this port will provide and the world needs American coal. This project is exactly the kind of economic boost that the state really needs. The benefits are numerous. The terminal would create jobs, generate significant new tax revenue, and help attract businesses to our area. In many ways, it can be a source of continued growth for years to come. It is tough to believe that a project with an obvious upside like this has been held up for so long. Those in charge should view this project for its benefits to the community and see it through to the finish. Our citizens are counting on it. Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done!

Submission Number: ***TRANS-PASCO-M1-00058***

Received: 6/2/2016 12:00:00 AM
Commenter: Laura Simmons
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. My name is Laura Simmons (phonetic) and I live in Longview. I feel compelled to speak today about my experience of living in a coal producing area. I raised my three children -- I'm a mom. I raised my children in Cynon Valley (phonetic) which is a geographical coal mining district in New South Wales, Australia.

We lived half a mile from the main rail line that ran 30-plus coal trains every day from the Hunter Valley to the Port of Newcastle for export. And our family did not experience the air quality issues or the coal dust that is being spoken of today or the health-related concerns that are continually raised in connection with coal.

In fact, I never knew about coal dust being a problem until coming to these public hearings. My people still live within a half mile radius of Newcastle that exports 100 million tons of coal per year without experiencing any of the health issues that have been raised.

I think that we must stick to the facts and not be swayed by the fear factor that surrounds coal. I have had firsthand experience of how a coal terminal operates successfully around suburbia, as my husband has worked in one for 28 years, who is still very healthy. And my family still lives within that area.

I fully support Millennium building it right. And finally, the Draft EIS has come to the conclusion that the operation of the proposed terminal will comply with all of Washington's strict environmental requirements which will allow it to operate effectively alongside a thriving community and I say go Millennium.

Thank you.

Submission Number: ***TRANS-SPOKANE-M2-00033***

Received: 5/26/2016 12:00:00 AM
Commenter: Robin Simmons
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Robin Simmons, and I live in Longview. And I feel compelled to speak of my experience.

I'm no one special, but I've raised my three children in the Hunter Valley, a coal mining district in East South Wales, Australia. We lived a half mile from the main rail line that runs 30-plus coal trains every day from the Hunter Valley coal mines to the Port of New Castle for export.

Our family did not experience air quality issues, coal dust problems, or any of the health-related concerns that have been raised here today. In fact, I never even knew about coal dust being a problem until coming to these public hearings.

My family still lives within a half-mile radius of the New Castle coal loading facility that exports a hundred million tons of coal a year.

We must stick to the facts and not be swayed by the fear factor that surrounds coal.

I have also had first-hand experience of how a coal terminal operates successfully, as my house, who is still very healthy, worked at one for 28 years. I fully support Millennium building it right, and that finally the Draft EIS has come to the conclusion that the operation of the proposed terminal will comply with all of Washington's strict environmental requirements, allowing it to operate effectively alongside a thriving Longview community. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002994***

Received: 6/13/2016 4:25:04 PM
Commenter: Robyn Simmons
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***TRANS-PASCO-M1-00066***

Received: 6/2/2016 12:00:00 AM
Commenter: Steve Simmons
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thanks for hearing me today. My name is the Steve Simmons (phonetic). I'm a local businessman here in the Tri-Cities. I'm testifying in support of the Millennium Bulk Terminal.

The EIS has demonstrated that there is no environmental impact for the construction of the project and that the project will make no difference in the amount of coal that gets shipped to Asia or the amount of coal that comes through our state on trains. We need the jobs badly in this state.

There're high-paying jobs, probably union jobs in the community that could really use some economic good news. Unemployment has been very high in the Longview area and they have taken it on the chin over the last decade or so.

So, again, I am in support of the coal terminal. Let's bring back Washington jobs.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001823***

Received: 6/2/2016 5:38:09 PM
Commenter: Trevor Simmons
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please move forward with the government’s environmental study. I say let's get moving with the Longview port ASAP. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn’t like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. Thank you for taking my comment and for providing the opportunity to weigh in. I believe strongly in this project and hope that you will consider the strong commitment Millennium has made to restoring and protecting the environment in our community.

Submission Number: ***TRANS-SPOKANE-M1-00062***

Received: 5/26/2016 12:00:00 AM
Commenter: Simon
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Simon. I'm a student at the University of Montana advocating for the no-action option to the Longview coal export terminal because as a young person that's currently present and largely coal caused climate crisis endangers the health and stability of my future.

I believe we have a common interest in doing all we can to fight this crisis especially in the light that I normally -- severe and early wildfires like that at Fort McMurray where 8,000 residents were evacuated almost overnight.

So it's unfair to endanger our homes as Northwesterners, and more efficient and clean coal will emit (inaudible), but nonetheless cause the destabilization of the climate.

This proposal also increases the demand for the extraction of coal in Eastern Montana and other states. Coal miners in Montana have outlined and have as their consolation Otter Creek line and the Tongue River Railroad.

It is clear that we don't want the pollution of water, air, land, and communities that follow coal and none of these things are accounted for in the DEIS, nor do we want more severe wildfires like the one I mentioned at Fort McMurray.

The inevitable decline of the fossil fuel industry means we should support worker's jobs that will be lost in this transition. Proposals like this only prolong inevitable decline. Look at the Peabody bankruptcy for the greater trend of market moving against coal, and also those agreements like Paris and United Nations agreed to take immediate action on climate change.

Furthermore, America's solar industry is growing almost 20 times faster than the rest of the U.S. economy and, while that is happening, coal is on its way out, so coal is an outdated industry. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000864***

Received: 5/24/2016 2:21:15 PM
Commenter: Dorethea Simone
Organization: Retired Nurse
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

May 24th, 2016 To ask WA Dept of Ecology who have the DEIS about the largest Coal Export Terminal in America coming to Longview. Water is in our news, today. in Flint (MI) their water killed people and coverups are being exposed. People “get it” that we need safe water. In Camas, WA last week, water was off for 4 hours to check for lead and more water turn offs, in other towns as well. Times are serious for us. Also, as a Nurse, I say, you must prevent Coal Corporations from poisoning any people, via waters. Being sorry later will not help. More and better, Complete health impacts studies are actually the only safe option. Just the one chemical, surfactant, has inadequate health impact studies for use on this Coal, so far, right? Is this a similar surfactant to the one that failed to help the Gulf of Mexico Oil spills? That one continues to damage oceans' floor life, after many years. How does Big Coals' chemical compare? What are the effects on humans exposed to surfactant, long term? Short term, you know that this causes eye, lung and skin damage. Are X-Rays of lungs routine after exposure, now? Then, after 6 months? Scar tissue could result from toxins into lungs, so this is vital to know. Please, do a more complete Health Impact study! Thanks. When these chemical surfactants get into the waters at the terminal and nearby waters, with the expected earth quakes in Longview, does your impact statement determine we wait until after the earthquakes? That would be very poor risk assessment and not inadequate. Health impacts in depth are the only safe option. How quickly will surfactant kill fish and marine life? How will people consuming fish be damaged? What about the Powder River Coal's “Powertreat” in that area flying to the areas on transport via dust and rain falling on that, taking it into soil? What if cows and life stock eat this surfactant poison? What does this poison do to the foods growing near tracks? Please, address all these issues, for the sake of all families exposed to poisons. Thank you for doing what is needed, for all...A Strong and Complete Health Impact study! Please take care of life, rather than Corporations. Thanks!!!!

Submission Number: ***TRANS-LV-Q1-00065***

Received: 5/24/2016 12:00:00 AM
Commenter: Dorethea Simone
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Greetings. As a nurse, I call for your support of the no-action alternative, no helping big coal. The greenhouse gas appendix, table 47, please, address impacts on human and animal health from millions of tons of coal that Millennium wants to bring here. It is vital to include what health damages 37 million ton of CO2 emissions over 20 years would bring. Why not wait for more cleaner emission engines being built now instead? Why the rush to pollute us? What are the health impacts on Cowlitz County and Washington peoples like firefighters, families living near railroads, and local hospital workers? Will the taxpayers pay or sue when people cannot get to the hospitals on time due to the constant coal trafficking? And I meant to spell that the same way as drug trafficking is spelled because I think this is a criminal substance. Please include the baseline present air quality near railroads, and then tell us how much worse before an evacuation is advised for our families. Citizens with asthma, bronchitis, COPD, and heart conditions are already relocating to escape. As you know, coal trains cause health damage to pediatric and elderly populations. So when will you officially tell families to relocate? Lowest income families may have great difficulty moving. Who will help them? This must be decided and included in your impact study. No coal exports, please. Coal is obsolete. Coal kills. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001587***

Received: 5/31/2016 5:28:01 PM
Commenter: Duane Simons
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing today to express my support for the Millennium Bulk Terminals project in Longview. I am glad for the opportunity to voice my support of this important project. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. Thanks again to the agencies for allowing public comment on this important proposal. It should continue to go forward with much enthusiasm.

Submission Number: ***MBTL-SEPA-DEIS-0001715***

Received: 5/31/2016 11:36:17 PM
Commenter: Gary Simonsen
Organization: Exceed Medical Inc
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I vote NO to the constrution of any coal or oil terminal in Washington State.

Submission Number: ***MBTL-SEPA-DEIS-0001877***

Received: 6/2/2016 6:24:43 PM
Commenter: David Simonson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you put a halt to the unnecessary delays and move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region and the coal from the Powder River Basin is lower in sulfur and cleaner burning than Asian coal. Longview need more jobs like these higher quality jobs, especially in Cowlitz County where our unemployment rate is 8 percent. Millennium Bulk Terminals can bring great jobs to our country, not to mention the much-needed tax revenues. Let’s not forget about how much time, effort and money Millennium has spent to clean up the port. Frankly, it was an environmental blight on our community, but now it will be a critical link for expanding trade for Southwest Washington. Again, having good jobs and protecting the environment can go hand in hand. The coal being shipped generates 40% of its sales value in federal and state taxes that will also help our country. The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward.

Submission Number: ***MBTL-SEPA-DEIS-0000418***

Received: 5/17/2016 6:38:16 PM
Commenter: Alden and Kimberly Simpson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium's proposal. Now that the rail corridor has been studied, now it's time for progress on the Millennium project! Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0001561***

Received: 5/31/2016 5:10:51 PM
Commenter: Carol Sims
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let's be clear, the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001264***

Received: 5/26/2016 6:27:16 PM
Commenter: Lara Sims
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. Millennium has helped clean up the old Reynolds facility and the Columbia River. The old industrial site had degraded water quality and fish habitats on the river. Millennium has completely turned this around. Millennium has demonstrated a commitment to do everything in its power to contribute to the well-being of the community and local environment. If you ask people in Longview what they think of Millennium, they will tell you they are a good neighbor, good employer and responsible steward of our environment. I'll look forward to updates.

Submission Number: ***MBTL-SEPA-DEIS-0001467***

Received: 5/30/2016 6:25:44 PM
Commenter: Preston Singletary
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

In light of the proven degree of pollution of the air and water along the routes used during the transportation of the coal as well as the potential for serious accidents, not only during transportation but during the handling and transfer from train to ship, I would be opposed to the development of any such coal terminal in an environmentally sensitive area like the Cowlitz/Lower Columbia River area. On a larger scale, I don't feel that supporting and encouraging the large-scale consumption of such a polluting form of fossil fuel, in spite of short-term economic arguments, is in the best interests of this country.

Submission Number: ***MBTL-SEPA-DEIS-0000357***

Received: 5/13/2016 12:46:14 AM
Commenter: Mary Sinker
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It is difficult to see how this project could be approved after reading the the adverse and cumulative impacts (Section 6) that would be produced by the proposed coal terminal for Longview, WA. Adverse and cumulative impacts are indicated as being "Yes" for every single category except for groundwater. Climate change and coal's impact on Earth's rising temperatures must be considered with a project of this size. Any significant contribution to global warming is grounds to reject this project. Thank you for considering my comment.

Submission Number: ***MBTL-SEPA-DEIS-0001221***

Received: 5/26/2016 6:02:09 PM
Commenter: Chad Siroky
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and should be treated as such. An environmental review of this time and scope should not have been needed to redevelop an old smelter site. The Draft EIS is sufficient, it’s time to move forward. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0002000***

Received: 6/6/2016 2:49:24 PM
Commenter: Karen Sisson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Moving this project forward is important to me, my family and my community. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! This DEIS is being finely crafted. The progress this port represents should not be hampered. It's time to get folks back to work!

Submission Number: ***MBTL-SEPA-DEIS-0000328***

Received: 5/11/2016 2:31:43 AM
Commenter: BRIAN SKEELS
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and wan to underscore my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing market, thereby spurring greater investments at home. Washington has long depended on trade and exports as vital part of our economy, directly and indirectly creating nearly 40 percent of all of our stat's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0000631***

Received: 5/20/2016 1:13:38 PM
Commenter: Jacob Skokan
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. What most folks in Seattle tend to forget is that not everyone in Washington lives in Puget Sound. Not all of us work in the high-tech industry, and we still earn good livings as farmers, working at ports or in manufacturing. We make things, harvest and develop natural resources, feed our community and help facilitate trade in our great state. And we need more jobs like this, especially in Cowlitz County where our unemployment rate is 8 percent. Millennium Bulk Terminals can bring great jobs to our county, not to mention the much-needed tax revenues. Let’s not forget about how much time, effort and money Millennium has spent to clean up the port. Frankly, it was an environmental blight on our community, but now it will be a critical link for expanding trade for Southwest Washington. Again, having good jobs and protecting the environment can go hand in hand. I’m certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

Submission Number: ***MBTL-SEPA-DEIS-0001295***

Received: 5/26/2016 6:47:40 PM
Commenter: Josh Skorcz
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. The agencies are doing a great job of evaluating Millennium Bulk Terminals port proposal. I am convinced that this project's permit should move forward without further delay. I also want to add that this project affects families in other areas of the country, my family in fact. I have a wife and 5 kids and I depend on the mining industry in Wyoming to feed my family and put a roof over our heads. From a Wyoming family to the families Cowlitz County, this project is a worthy endeavor, please move forward with it.

Submission Number: ***MBTL-SEPA-DEIS-0000429***

Received: 5/17/2016 6:50:23 PM
Commenter: Steve Skordas
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Millennium Bulk Terminals will bring jobs and stability to Cowlitz County. Export projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen. When the trains are loaded in Montana, Millennium puts a liquid cover like a glue on top of the cars. This eliminates a lot of the coal dust that would normally come off of train cars. Millennium is building this world class export facility right! Remember what matters and keep the focus local! Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on Millennium’s application.

Slack, Bruce (0739)

Submission Number: ***MBTL-SEPA-DEIS-0000739***

Received: 5/23/2016 1:45:51 PM
Commenter: Bruce Slack
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. MBT has received a thorough and comprehensive draft EIS reviewâ€"one five years in the making. If we don’t take the next step forward and turn this vision into a reality, it’s going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage?

Submission Number: ***MBTL-SEPA-DEIS-0001007***

Received: 5/24/2016 6:02:45 PM
Commenter: William Slagle
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm glad to have the chance to make a comment about this project as it's very important to me. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality.

Submission Number: ***MBTL-SEPA-DEIS-0000215***

Received: 5/10/2016 4:56:57 PM
Commenter: Keith Slater
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Please consider my comments on the DEIS of the proposed Cowlitz County coal export terminal. This is an excellent project and one that will bring broad-ranging economic benefits to Washington and to the national economic outlook for years to come.

Submission Number: ***MBTL-SEPA-DEIS-0003339***

Received: 6/13/2016 9:15:02 PM
Commenter: Shon Small
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003293***

Received: 6/13/2016 8:01:04 PM
Commenter: Dawn Smallman
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

If this terminal were built, its impacts would reach far beyond Longiew, WA. Your DEIS is oddly dismissive of the well-documented negative impacts about coal dust coming from train cars. Why is this? Especially when its well-documented that agents placed on top of the coal in open cars don't perform well on long-distance routes. And that coal dust in water, on land and in air is deadly. All of the communities' health that live along the trains running through many states would suffer. Respiratory health problems would increase in communities (including Longview) if this terminal were built. The cleanliness of our Columbia River would suffer from the dust, due to the short distance between the train tracks and the water. It will have negative impacts on salmon recovery, which WA and OR have spent a tremendous amount of money on - making it not just environmentally unwise, but fiscally unwise. As we recently saw with the train derailment in Mosier, OR, there is no way to guarantee train safety. Coal trains have no place in the Columbia River Gorge, with the tracks so close to our most important waterway - a coal train derailment is a real possibility that puts our river's and wildlife's health at risk. The increase in train traffic means (76) more trains daily on WA tracks - in addition to the coal dust pollution, that's a considerable increase in noise pollution for all of the many communities who live along the tracks. The terminal would more than double the trains moving through these communities - negative impacts will follow - the real estate will devalue in these communities. The City of Longview has no moral right to advance a project for only their own monetary self-gain, while plummeting neighboring communities land values and livability. One train every 7 minutes running through your community is not how any sensible town would choose to live. Moving this cargo would result in thousands more vessels in the Columbia River and in the Salish Sea - places where accidents would catastrophic and even without an accident, would devalue their beauty, placing recreation and tourism dollars at risk. This project will contaminate the Columbia Gorge National Scenic Area and violate the Clean Water Act. Environmental groups will pursue holding the project under that focus for that violation. And, as if all of these locally-focused points aren't good enough reasons to oppose this terminal, they dwarf in comparison to coal's contribution to climate change, which is and will continue to bring the most dire consequences upon us all, beginning by impacting the poorest and most economically vulnerable communities of the world first. Coal blackens our air and acidifies our oceans. How can a state with a border on the Pacific Ocean be considering a project as unwise as a coal investment in 2016? Our ocean fisheries are a huge part of WA and OR's economies and health. Coal is dirty and is dying as a source of energy - its in a economic plunge and will continue on that path. Longview needs to oppose this terminal based on a long-term economic view for its resident and its neighbors. Once Longview is a dirty coal town, and coal is phased out as an energy source (which is happening rapidly throughout the world), Longview will be vacated as a toxic town that went "all in" placing a bad bet on an obviously losing proposition. All for a ill-sighted gain of a few local jobs. Longview and the state of Washington would be far wiser to step up and bring the jobs of tomorrow's healthy economies to their town, than jumping on the sinking ship that is the coal industry. You owe it to not just neighboring communities like mine, but to your own community there in Longview.

Submission Number: ***MBTL-SEPA-DEIS-0001368***

Received: 5/26/2016 7:22:50 PM
Commenter: Anthony Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

In a time that has included seeing neighbors and friends out of work and under-employed, we need to encourage economic development. In my opinion, that cannot happen soon enough. That is why I am writing today. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. Now's the time to utilize trade infrastructure. The Millennium Bulk Terminals project is one step closer to being able to participate in this vital business. Thanks to the agencies for considering my comments. - The EPA would not even allow our hydro power be considered as a renewable resource thus calling rain and snow created by the environment something besides a clean product of nature. This alone shows they are anti anything but a agenda that does not allow common sense to access the decision making process of ramping to a future versus falling off a cliff. It will be many decades before we are all driving flying saucers and baking with solar ovens.

SMITH, CAREN (2619)

Submission Number: ***MBTL-SEPA-DEIS-0002619***

Received: 6/13/2016 11:37:57 AM
Commenter: CAREN SMITH
Organization: POWDER RIVER ENERGY CORP
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I live in Wyoming and would like our coal to become available to international markets. If they can receive our coal by rail, that is a positive for Wyoming

Submission Number: ***TRANS-SPOKANE-M2-00067***

Received: 5/26/2016 12:00:00 AM
Commenter: Catherine Smith
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. I'm Catherine Smith, and I've lived in Spokane since 1989.

I left the environmental degradation of Texas to come to the Evergreen state to live in a place where I have clean air and water that was drinkable, and feel safe. And I brought my children here for that express purpose. And I have enjoyed it here, however it is frightening to have to continually deal with these environmental threats, like this ongoing coal train and oil train business. It's terrifying. I'm a homeowner. I work here. I enjoy my life here. I enjoy the good drinking water, but I fear for what we're loosing and for what has happened to the fish here and air quality.

I see the air ratings. They go -- sometimes they're moderate, but sometimes they just go through the roof, especially as the fires keep increasing every summer. What does it mean when we have the coal dust in the air and we can have these oil tanks and these fires that just keep getting worse and worse.

Tragic circumstances can happen in this area and I'm terrified. I hope you guys make the right decision and vote for the no action alternative. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003239***

Received: 6/13/2016 7:05:52 PM
Commenter: Cathy Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Our state is trade dependent and a critical part of the import/export infrastructure of the West coast. International trade is essential to the economy of Washington and supports many family-wage jobs. This project is exactly the kind of economic boost that the state really needs. The benefits are numerous. The terminal would create jobs, generate significant new tax revenue, and help attract businesses to our area. In many ways, it can be a source of continued growth for years to come. It is tough to believe that a project with an obvious upside like this has been held up for so long. Those in charge should view this project for its benefits to the community and see it through to the finish. Our citizens are counting on it. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium’s proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time. Sincerely, Cathy Smith Casmith64@hotmail.com 98632-4928

Smith, Cheryl (2858)

Submission Number: ***MBTL-SEPA-DEIS-0002858***

Received: 6/13/2016 2:50:22 PM
Commenter: Cheryl Smith
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002230***

Received: 6/7/2016 8:40:59 PM
Commenter: Clyde Smith
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Here we go again - anything for money. The USA has cut way back on coal use because of environmental issues. Now it's okay to ship coal to other countries for their use regardless, even though the pollution from the coal use in those countries will eventually reach our country through the jet stream. Start with the fact we need to ship the coal thousands of miles to find a port that will accept the coal plus the destruction and rape of the coal mining from the mines or open pits. We also have the risk of accidents to the trains and the dust released into our air. This is a lose - lose situation - too many negatives with very little benefit to anyone except several big corporations. After all eventually we have to breathe the air coming from Japan or South Korea or China. Spokane already has over 70 trains passing right through our valley and through the central part of Spokane. Any kind of accident would be a total disaster. If this port is opened there could be an additional 16 trains passing through Spokane Valley and Spokane. By 2028 there's a possibility of 106 trains passing through daily with the growth of other shipments on the line. This whole idea of continuing to ship coal just for the money is a disaster waiting to happen. A lot of people could be hurt or killed. Please TURN THIS PROJECT DOWN AND LEAVE THE COAL IN THE GROUND! We have new much cleaner technology.. We have new much cleaner technology.

Submission Number: ***MBTL-SEPA-DEIS-0000728***

Received: 5/23/2016 1:27:46 PM
Commenter: Cody Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let's be clear the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don't hold them up any longer.

Submission Number: ***MBTL-SEPA-DEIS-0000211***

Received: 5/10/2016 4:53:20 PM
Commenter: David Smith
Organization:
State: Colorado

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
please stop this terminal

Submission Number: ***MBTL-SEPA-DEIS-0000900***

Received: 5/24/2016 5:02:39 PM
Commenter: David Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please move forward with the government’s environmental study. I say let's get moving with the Longview port ASAP. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it’s time Longview went back to work. Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays.

Submission Number: ***MBTL-SEPA-DEIS-0001804***

Received: 6/2/2016 5:22:51 PM
Commenter: David Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community and four western States. It’s about time! I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Submission Number: ***MBTL-SEPA-DEIS-0000719***

Received: 5/23/2016 1:10:40 PM
Commenter: Delbert Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. Media coverage would have us believe that transporting coal by rail through our state is unprecedented, it’s not. We’ve transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Submission Number: ***TRANS-PASCO-M1-00038***

Received: 6/2/2016 12:00:00 AM
Commenter: Eric Smith
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. My name is Eric Smith (phonetic). I'm a retired hydrotech CEO living in White Salmon, Washington. I cofounded and led an Oregon company which now employs over 500 people and still growing. So I feel I'm qualified to opine about creating jobs.

I didn't need tax breaks or environmental waivers to create jobs. What I needed was talented people. And talented people don't want to be near coal chutes or coal piles.

Four years ago a Gresham man personally noted that coal is a dead man walking. At that time the business model was deteriorating, nobody would ensure a coal carbon project and carbon sequestration was destined to be a loser. Coal does, however, continue until now all the U.S. coal companies are bankrupt and there is 2.7 cleanup bill that you and I may end up paying.

In March, the U.S. used 33 percent less coal than last year. Coal demand is shrinking worldwide and continues to fall. And the impressive trajectory of wind and solar power guarantees coal's obsolescence. Today there are no companies that will (inaudible) this terminal. This zombie project is being perpetuated by a vulture (inaudible) hoping to sell to the next bigger fool. Let's not be the next bigger fool. To the elected who support this project, don't you understand the coal global markets are collapsing and will never return? Or is this your best idea for creating jobs? We're tired of you supporting large companies by socializing costs while privatizing profit.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000018***

Received: 4/30/2016 8:55:26 AM
Commenter: Gary Smith
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I strongly favor approval of the Millennium project. I foresee only positive impacts to the community and state once the mitigation strategies have been implemented. The decision makers would be wise to expedite a favorable decision and move the project forward.

Submission Number: ***MBTL-SEPA-DEIS-0003401***

Received: 6/14/2016 1:15:05 AM
Commenter: George Smith
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I urge you to deny a permit for millennium bulk terminals due to the close proximity to residential areas and the nearness to the municipal water supply for the city of Longview Washington. Cowlitz County is, I believe, already second highest area in Washington State for respiratory illness and any additional particulate matter in our air will only contribute to increasing our asthma and heart disease rates. The area where 16 additional trains will pass along with their attendant noise and diesel emissions is just a few yards from Longviews most economically distressed neighborhoods who will have no choice to leave the area because there is nowhere for them to go. And let's not forget the children who live in that neighborhood, who are traditionally among the poorest (academically) students in our school district. Are they to be condemned to fall farther into poverty because of an industry that is a poor fit into our community with a 24/7 din of train whistles? We all have read the reports how important sleep is to a young student. I lived in Longview when the Reynolds aluminum smelter was in full operation and I remember how gritty and dirty the air was then and I don't want to go back there. I have worked in industrial maintenance at several of the mills in the area and it has always been the case when money gets tight preventive maintenance takes a back seat to profit. I am happy Longview is becoming a cleaner place to live, please don't push us back to the bad old days, help move Longview into the future. No permit for millennium bulk terminals, please.

Submission Number: ***MBTL-SEPA-DEIS-0000919***

Received: 5/24/2016 5:10:58 PM
Commenter: harriett smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. I urge you not to be swayed by outside fanatics who do not care about our county or our people. The environmental review process for Millennium Bulk Terminals should be held to the same standard as every other port or infrastructure project. We have a very fair and comprehensive process in place, and I question the motives of those who say otherwise. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0002985***

Received: 6/13/2016 3:58:18 PM
Commenter: Janice Smith
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***TRANS-LV-M2-00045***

Received: 5/24/2016 12:00:00 AM
Commenter: Janice Smith
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. My name is Janice Smith, and I'm a rural member of Warm Springs, Oregon, and I am a Wasco Warm Springs. And, no, I'm not from someplace else. I'm a United States citizen. I am a veteran. I come from a family of veterans. We are proud people.

My father, my grandfather, my brother, we are all fishermen. That is something -- it's not a livelihood, it's a tradition. It's a tradition of life. It is a staple that we cannot do without. It is as important to us as much as air, water, bearing roots. This is what we are.

Coal is not something that we are. I appeal to you as mothers, grandmothers, aunties. I appeal to you sisters because it is so important, as I've heard in this room, the impact that it has on the environment.

I am a student of ecology. I'm in college. I am 70 years old and I am in college because economy demands that I go back and get another profession. Talk about unemployment. Unemployment in Warm Springs is 70 to 80 percent.

So, yes, in some communities money is a motivator, but not at the expense of our environment, not at the expense of organisms, animal species. We can't compromise that because it's too much at this moment that -- you know, like I said, this is our livelihood. This is who we are. The fish is who we are.

And we're not from someplace else. We are citizens of the United States. We are First Nation. That's who we are. I'm a proud Native American woman. I'm a veteran. I'm a fisherman, and I'm a college student.

Thank you.

May 25, 2016

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

Dear EIS Evaluators,

Thank you for writing the environmental impact statement (EIS) for the Millennium Bulk Terminals in Longview, Washington. Thank you, too, for accepting my public comment.

Your EIS is alarming to say the least. You point out significant impacts to the Columbia River Basin and to Washington State, but I would suggest you don't go far enough. The impacts extend to the whole length of the transportation routefrom the Power River coalmines to the site of the export facility.

- I am deeply opposed to this coal export facility. I encourage your outright rejection of this proposal and call for an adjusted No Action alternative that terminates all future planning for coal export and prohibits all coal exports from the applicant's leased property.

The company in question is not trustworthy. In 2010, the Millennium Corporation misled the Longview community about the intended size of their proposed coal export terminal. Only when the news media revealed internal memos did the company pull their permits and tell the truth: they wanted to export 44 million tons, not eight, of coal every year from Longview.

This project has significant, unavoidable impacts:

- greenhouse gas emissions and accelerated global warming,
- health and safety concerns of people living along the tracks,
- coal dust accumulations adversely affecting the land, rivers, and streams, and
- vastly increased rail traffic and potential safety concerns as more coal trains clog the tracks along with volatile Bakken oil trains.

This proposal would add 16 coal trains a day, half loaded, half empty. The increased trains will affect more than Cowlitz County and more than Washington State. They will exceed current capacity in Idaho and in my home state of Montana, and, since the trains go through the middle of many towns and cities, the increase in coal dust and diesel fumes will adversely affect the health of all humans in residential neighborhoods next to the tracks.

The wide-ranging health dangers of coal dust include exposure to toxic heavy metals like mercury, cancer, and increased rates of asthma, especially in children.

Coal dust is a real and significant hazard. One recent report noted, “So much coal dust escapes from the open-top rail cars used for transporting coal that it can create safety problems for rail traffic. Coal dust deposits sometimes cause spontaneous fires, and in 2005, for example, coal dust that had accumulated in ballast, the layer of crushed rock that supports rail tracks, caused derailments.”

Powder River Basin (PRB) coal—the type that would be exported from proposed terminals in the region—is notoriously difficult to handle without enormous amounts of escaping dust. One technical analysis finds that “PRB coal is extremely friable and will break down into smaller particles virtually independent of how the coal is transported or handled.”

Even BNSF Railway has studied the problem. The railroad found that as much as a ton of coal dust can escape from a single loaded coal car. Some reports estimate that three percent of a coal car’s load, which is typically 100 tons or more, can blow away in transit.

The US Department of Transportation classifies coal dust as a “pernicious ballast foulant” that can weaken and destabilize rail tracks.

Dan Jaffe, a professor of atmospheric science at the University of Washington, installed air-monitoring equipment on private property near rail lines in Bellingham, Seattle, and in the Columbia River Gorge in 2013 and 2014. He then analyzed the emissions from hundreds of trains and concluded that passing coal trains do in fact spread notable quantities of dust. He calls a small number of coal trains qualify “super-dusters” because they send prolific volumes of coal dust into the air.

Your EIS mentions unavoidable and significant delays at rail crossings near the facility but should also take into account multiple delays route-wide, from eastern Montana to western Washington.

Please note that in Montana the railroads parallel our rivers. Our rivers are still wild and healthy, and they support a recreational economy second to none. Moving 44 million tons of coal a year threatens these rivers and the economy that depends on them.

China cut its coal imports by a third in 2015, and the economics of this proposal are riddled with questions. Coal prices have plummeted 62 percent in the last five years, and U.S. coal production has dropped by more than half since 2008. Some 50 coal companies have declared bankruptcy since 2012.

Specifically, Arch Coal filed for bankruptcy in January. Peabody, the largest coal miner in the country, did the same in April. Australian-based Ambre Energy, a former backer of the Millennium project in Longview, got out of North American coal in 2014, because it, too, became insolvent. Cloud Peak Energy, a minority partner in the Millennium proposal, is paying millions of dollars *not* to ship coal through a British Columbia port, since any coal exported would have to be sold at a loss in foreign markets.

Finally, I am very concerned about the global warming impacts of this proposal. According to the Draft EIS, the terminal would export up to 44 million tons of coal a year, and the associated combustion would increase global carbon emissions by 37.6 metric tons annually, the equivalent of adding seven new coal power plants.

Exporting North American coal to be incinerated in Asia means more environmental problems here at home. In the Northwest we are experiencing shorter winters, less snow, less water in our streams and rivers, more and more extreme forest fires. One only needs to look to our neighbors to the north in Fort McMurray, Alberta, to see the kind of catastrophic future fires in store for us if we greenlight projects like the Millennium Bulk Terminals, pretending they are benign.

Our ways of life are changing, and, if we don't radically reduce our reliance on carbon-intensive fossil fuels, things will only get worse. In fact, we are beginning to trigger the tipping points that are altering our arctic ecosystem. We are beginning to threaten the very survival of people on this lovely planet.

It’s wrong to cause catastrophic climate change. It’s wrong for companies like the Millennium Bulk Terminals to profit from the resulting environmental and social wreckage.

Please reject the Millennium Bulk Terminals proposal.

Jeff Smith
105 Channel Drive
Missoula, MT 59804

Smith, Keith (0553)

Submission Number: ***MBTL-SEPA-DEIS-0000553***

Received: 5/19/2016 6:00:00 PM
Commenter: Keith Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. This draft EIS is exhaustive; there is nothing further to study. Coal is an abundant commodity that moves freely in a global market. Asian economies consumed over 5 billion tons of coal in 2012 without any exports through Washington ports. Additional supplies to feed that market are coming on line from Australia, Indonesia, South America and Mongolia, and domestic supplies in China are becoming more readily available. Assuming that incrementally new GHG releases will result from some portion, or all, of future coal exports from a new terminal in Longview Washington that, at maximum capacity, would amount to less than 1% of Asian coal use, requires a degree of speculation that is not permissible under SEPA or NEPA. Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

Smith, Laurie (0427)

Submission Number: ***MBTL-SEPA-DEIS-0000427***

Received: 5/17/2016 6:48:37 PM
Commenter: Laurie Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please move forward with the government’s environmental study. I say let's get moving with the Longview port ASAP. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don’t hold them up any longer.

Submission Number: ***MBTL-SEPA-DEIS-0002753***

Received: 6/13/2016 2:11:30 PM
Commenter: Michael Smith
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002017***

Received: 6/6/2016 3:02:35 PM
Commenter: Nels Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Low sulfur Wyoming coal used in Asia will result in lower toxic emissions, a benefit to all, especially those of us downwind. i. e. the USA. Coal transported through a well planned, carefully operated facility will have minimal, if any, operations related environmental problems. Even more important than the economic boost from the construction phase of the project would be the community benefits of stable employment and business opportunity for the citizens of the area. These three points have so consistently occurred and been so frequently documented that citation would be superfluous. In addition to these personal comments, I support the following. Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly support the project and the thousands of jobs this project will create. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. I’m certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

Submission Number: ***MBTL-SEPA-DEIS-0003825***

Received: 6/14/2016 1:20:33 AM
Commenter: Paul Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments
Submission Text
Paul Smith:

I'm really happy to get a chance to comment on the health implications of the increasing coal shipments by rail for our communities and others. It's easy to make the case that negative health impacts with coal will occur because they've been occurring for the last several hundred years. There's no reason to think a little bit more is better.

I hope to stress the health threats local to Missoula and also stress that this new threat will be greatest on the vulnerable, including children, infants, the unborn, and the elderly. I also have a list of references that I always feel nervous talking and making statements without. If anybody wants the list of the references that at least give the health implications, please see me. Because I take care of children and infants with lung disease, obviously my main concern at the local level is the increase in air pollution from these diesel fumes, coal dust, and worsening climate change.

Data is substantial showing that coal trains do increase bloom concentrations. Diesel emissions are recognized as carcinogens, which was previously noted, and contain toxic substances such as polyaromatic hydrocarbons and particulate matter or PM. Coal dust also adds to air pollution in the form of particulate matter. Of the 6 criteria of air pollutants that the EPA is mandated to regulate, particulate matter is perhaps one of the easiest to track and to correlate with health effects.

It's generated a vast amount of medical literature. We know there is PM increase as public health worsens. We also know that when we lower particulate matter, population health improves. That's an important concept and lends significant credibility to particulate matter being culpable, and justifies action that lowers air pollution. Particulate matter leads to lung damage and diseases such as asthma and COPD. Children are at the highest risk because their lungs are developing and they have more life years of exposure.

This often worsens over decades from accumulating scar tissue along the airways by repeated injury. We have no cure for asthma. For today's living asthmatic children, they may end up being tomorrow's asthmatic cripples. In health, particulate matter also leads to diseases distant from the lungs such as heart disease, stroke, and cancer and even adverse effects on pregnancies and fetal tissue. Infants born to a mother exposed to high concentrations of particulate matter are born smaller, and with impaired lung function.

These more systemic effects outside of the lung happen in part because fine particulate matter can also cross pulmonary system directly into the circulation and they release whatever poisons they contain. Missoula already struggles with air quality in a large part because of our valley inversions that attract pollutants. Despite strong efforts to decrease particulate matter, we often, here in Missoula, are close to the prescribed threshold by the EPA for particulate matter.

There is no safe lower threshold. The more time one spends in high exposure of particulate matter, the greater the effects. Again, this is of special concern to children. Another health concern with coal dust is increased chance of train derailments. You might recall an article in the Missoulian last year quoting the Department of Transportation estimating that there would be over 10 derailments per year in the US of trains carrying nothing but ethanol and oil cargo alone. Missoula is a very populated area. It's time we realize that with only 2 hospitals in our town, we would struggle to handle the type of derailment disaster that hit Quebec killing 47 and devastating a small town.

Then finally the effects of coal combustion on climate change are already significant here in Montana. As it was noted, we've already come through 2 of the warmest years on records and the warmest April on record. Our snow pack is already lower than normal this year and it's disappearing. Our farmers and ranchers are threatened. Increased forest fires and hot weather will again threaten our health and our children's health.

By way of closing, one of my favorite quotes when giving a talk like this is from CF Elliot in 1909. He was then secretary of Anaconda Copper Mining Company. He stated, "We have the perfect right to carry on a legitimate business and if incidentally we should pollute the atmosphere nobody has the right to complain until specific damage gives them a cause of action." This statement really describes the position that we're in as a company.

We can't stop a process legally until we can show harm. By then, the ground, the air, and the water are contaminated, and our children are sick and it's too late. So ask yourself when we're coming through these discussions what angles are we heading in? Is the public being shouldered with the responsibility to prove harm or is the impetus on the industry to prove there's no harm? Harm to health has already been shown. There is specific cause for us to halt more pollution.

Steve Running: Yes, I want to particularly point out what I see happening in the global coal markets and global carbon cycle science. That's the stage that I work in, global carbon cycles. We, probably a decade ago, first identified really clearly that the biggest single carbon emission by humanity is burning coal for electric power. It became clear to us right at that point that everything else we do in trying to reduce carbon emissions wasn't going to matter at all if we didn't, first and highest priority, quit burning coal for electric power.

That was over a decade ago. It didn't seem like we were making much progress until about the last year. I can finally say that we've had a pretty good year in global policies. Obviously we all know about the Paris Climate Agreement where every nation signed on to a commitment for driving down carbon emissions, and for most countries that first biggest carbon emission is burning coal for electric power.

What's more immediately relevant to us here is that China not only signed the Paris Agreement, but China actually does a 5-year strategic plan for the nation. What a concept to actually plan the future of your nation. We've got learn something here. In the last 5-year plan, China has publicly announced that they will quit importing coal. What we're clearly seeing is that in 2014 and 2015, China's coal imports went down by actual statistics, so they're making good on this strategic plan that they've announced.

They are starting to drive down their purchasing of imported coal. Of course, their 2 biggest sources are Australia and us. They have already announced that they have a strategic objective to quit buying coal. I can't imagine a worse time for America to be building more coal infrastructure when the biggest customer has already announced publicly that they're going to quit buying. This is really almost a no-brainer.

What I also see now in this last year is that the world financial community has really started to catch on that long-term fossil fuel investment, and particularly long-term coal infrastructure investment, is just plain a bad idea. It's a bad investment. You have very high probability of losing your investment with the trajectory of the global economy and energy. When the world bank and Goldman Sachs, I read almost every week another major financial institution announcing that they are getting out of coal investment ... What we see here is the local version of that same decision point.

You would think this ought to be an easy decision, that the last thing the Pacific Northwest would want to do is invest in long-term infrastructure for coal export when a major customer has already announced that they're going to be capping their imports. I think this is to me, at the global scale that I work at and study and follow, this really should be a pretty easy decision then. This is certainly not a terminal that we want locally, but that even makes any sense in terms of a larger financial picture. It just doesn't make sense one bit. I think that's what I want to leave with you on this topic. Thank you.

Paul Smith: I'm really happy to get a chance to comment on the health implications of the increasing coal shipments by rail for our communities and others. It's easy to make the case that negative health impacts with coal will occur because they've been occurring for the last several hundred years. There's no reason to think a little bit more is better.

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By way of closing, one of my favorite quotes when giving a talk like this is from CF Elliot in 1909. He was then secretary of Anaconda Copper Mining Company. He stated, "We have the perfect right to carry on a legitimate business and if incidentally we should pollute the atmosphere nobody has the right to complain until specific damage gives them a cause of action." This statement really describes the position that we're in as a company.

We can't stop a process legally until we can show harm. By then, the ground, the air, and the water are contaminated, and our children are sick and it's too late. So ask yourself when we're coming through these discussions what angles are we heading in? Is the public being shouldered with the responsibility to prove harm or is the impetus on the industry to prove there's no harm? Harm to health has already been shown. There is specific cause for us to halt more pollution.

John: Good evening. I'm John Woodland. I retired in January as the Superior, Montana Fire Chief. I'm speaking from my background in emergency services, I do speak for myself. Superior is one of the many small towns along the rail line that this project will negatively impact. Emergency services and access to many of my district's neighborhoods require crossing the tracks. That's true of many other towns along the rail line. This is what's hauling our water supply across the tracks.

I personally waited at a grate crossing for a train to pass while on an emergency service response. This proposal lacked the train traffic. It increased the likelihood emergency services will be negatively impacted in communities all along the tracks. The tracks in Mineral County in places are built right along steep mountainsides next to the Clark Fork of the Columbia River. Trains fall off these tracks sometimes into the river and not that infrequently.

In my 10 years as the fire chief there have been 2 trains in the river in Mineral County. One visible from my home, included empty oil cars, and the other dumped Boeing fuselages into the Albertan Gorge. More traffic means more wrecks. More traffic will also mean more pressure not to hold up the trains for maintenance work which means yet again more wrecks. For Montana, Eastern Washington and Idaho, it also means less access and higher prices to ship agricultural products. For emergency services, today the 800-pound gorilla in the room is climate change.

If you don't think that's emergency service issue just look at the newspaper for the last week, at the evacuation of between 80 and 90,000 people from Ft. McMurray in May in

Northern Alberta, months before there's supposed to be a fire season in that part of the country. This is the future for the entire inter-mountain west if we don't act decisively now with climate change. We cannot continue to invest in fossil fuel projects, such as Longview, and have any chance of limiting the worst impacts of climate change. I urge you to say to no to the Longview Coal Port and yes to acting decisively on climate change now before it's too late.

Michael: My name is Michael Daniel Bolt. I'm a student at the University of Montana. I'm running for House District 98, Montana State District. I think preventing any new coal mining is the best choice. I'm also interested in bringing ideas of increasing government control over the natural resource industry including the coal industry. I believe government run operations of the coal industry would allow us to shut down that industry more responsibly and make any future natural resources extraction use projects really more beneficial to the Montana people. That's the main concession. That's all. Thank you.

Carolyn: Hello, my name is Carolyn Walker. I used to be Carolyn Alderson. I lived along the Tongue River for 20 years of my life. I raised my 3 children there. There is an interesting story about a law and a regulation that actually stopped something. When I lived down there, the Northern Plains Resource Council, I was part of it, was just beginning. That's when you all heard of the Tongue River Railroad. The Tongue River Railroad was thought of and started because there was a mining plan for that area, right on the Tongue River. It was called the Montco Mine.

Well there's a nice picture of me shaking hands with President Carter in 1977 at the signing of the strip mining bill. In that bill there's a piece of the legislation that says, "There shall be no strip mining on Alluvial Valley Floors." The Montco Mine was right on the Tongue River. It caused some difficulty in the community. I just wanted you to know that there are ways to use legislation and rules to stop bad things from happening. My recommendation is that we recommend no action on the Longview Port.

Jim: My name is Jim Parker. I live in Missoula Montana. As a Montanan along the rail corridor between the Powder River Basin mines and the proposed terminal I oppose the Millennium Bulk Terminals because of the associated increase in coal train traffic through my community. The increased coal train traffic will bring with it increased air pollution and health risks from increased coal dust and diesel exhaust and increased noise pollution.

In addition, the increase in coal traffic through my community will reduce access across the tracks and cause traffic delays for citizens, commuters, for emergency response vehicles when there's a medical emergency or fire, or a need for police. The additional train traffic will also provide greater potential for vehicle collisions with trains and for pedestrian accidents.

As a Missoulian and Montanan, I'm asking that the EIS fully analyze and consider the impacts of this port and the increased coal train traffic would cause here in Missoula and across Montana especially as it relates to the above sited impacts. The proposed project’s impacts are real and significant to Montanans and are connected in cumulative

result of what happens if this project is approved.

The EIS prepared by the court in the Washington Department of Ecology in Cowlitz County must include all the connected and cumulative impacts in Montana that will result if the MBTL facilities are approved and constructed. These include the significant connected and cumulative impacts on the project all the way back through Montana to the Power River Basin Coal Mines in Montana and Wyoming.

The increased rail traffic in Montana must be addressed, analyzed, and its consequences fully considered in the EIS. More trains in Montana will mean an increase in the amount of airborne pollutants, from diesel engines as well as from coal dust. Medical studies have shown a clear link between both diesel air pollutants and coal dust and disease.

While those with chronic disease, the elderly, young children, and pregnant women are most at risk, the health effects from particulate matter exposure may occur years later. Even healthy individuals need to be concerned. These issues must be addressed, analyzed, and their consequences fully considered in the EIS. The MBTL facility will directly lead to an increase in the burning of coal. The link between increased coal burning and associated public health problems cannot be ignored and should be included, analyzed, and the consequences fully considered in the EIS.

Finally, because the sole purpose of the MBTL facility is to facilitate the shipping of coal being transported from the PRB to its final destination in Asia, where it will be burned for energy, I also believe that the EIS must fully consider the long term and direct effects that this action will have on the global climate.

In conclusion, I strongly oppose the proposed Millennium Bulk Terminals Longview facility. The connected and cumulative impacts to Missoula, and all of Montana, from the proposed facility, are real and significant. The EIS prepared by the co-lead ggencies for this project must address, analyze, and consider all the connected and cumulative impacts this proposal will have on Montana. Please reject this proposal and take no action.

Thank you.

Harold: I'm Harold Hoem from Missoula. The whole town of Butte Montana went through a long period of horrible air quality early in this century because of ore smelting. Read a book called Smoke Wars. People sickened and then died especially underground miners like my grandfather who was cut down in the prime of life by lung disease. The corporate giants called the air pollution a nuisance. It was deadly. Oh, what a nuisance Biff was to my family.

What are some corporations proposing to do this century later but ship Montana coal overseas so citizens there can get sick and die from nuisance called coal? A friend of mine who was a former coal mine manager says this, "The problem with the coal mining industry is the product is a poison”. We know that CO2 is increasing dramatically. It is now over 400 parts per million. Humanity hasn't seen this stuff but it is affecting climate

change dramatically.

The current wildfire in Ft. McMurray in Alberta Canada caused the evacuation of over 88,000 people. The smoke from each building is hundreds of miles away. Perhaps a wake-up call for Montana. We have rapidly declining snow pack and are facing longer and harder, tired, and more dangerous fire seasons and possibly worse than Iroquois. For sure a nuisance for residents and a real downer for tourism. The DEIS gives Montana a scant potential.

They say 16 additional coal trains a day would go through Missoula that cite inflated numbers for existing traffic of 25 to 28 trains. We currently see only 13 to 15 trains. 16 more trains would double current traffic. The effects would ripple down all the impacts of safety risks, derailments, noise, dust, the laser crossings et cetera. They should know where our current capacity is and give assurances that deficiencies will be mitigated. My last word , bring down CO2 emissions by switching to renewables. Vote no action. Show the US means business in climate litigation.

Gary: I'd first like to thank Northern Plains and the Hoems in particular for it, and Les Anderson coming all the way from Longview to speak here. The speakers, it's been a very nice haven. Thanks for this opportunity to comment. Hi there, I'm Gary Mattson. I live in West Riverside, which is a suburb of Milltown. I really seriously, if the most serious effects of this port certainly have to do with health and climate change.

For those reasons, I am just baffled that so many people either ignore the science, or deny the science, or simply don't know about the science. I cannot understand why we have so many people that are not supportive of recognizing climate change demand. Some of the effects aren't realized. I can see in my community. Milltown has one singal entrance to it across on the south side of Powder River, there is one railroad crossing.

If that railroad crossing was blocked, no emergency services can occur. Our fire chief manager will recognize that concern. In Missoula County that's 10. That has a significant impact. The additional of 16 trains would really be a big impact on emergency services. For multiple reasons, I would strongly recommend that no action alternative.

George: Thank you, thank you all for being here. My name is George Price. I was asked to represent an organization I belong to named Indian People's Action. Indian People's Action asked me to be here as an environmental issues coordinator.

I would like to put our input collectively in here; just the fact the basis what coal is doing to our climate and the life on earth. I think that should be enough reason to keep it in the ground, not transport it anywhere. Anybody who's paying attention and looking at how fast this is escalating climate change to an unpredictable level at levels with all the other elements that are being released. Rising sea levels, you can go down the whole list if anybody's honest about that, you would say yes, let's stop all of this.

I'd also like to say let's look at the paradigm shift and deeply question a society that creates incentives for people to write environmental impact statements that are

intentionally lying to the people for profit, for money in a society that lives for money. I'm not going to go into my whole historian's diatribe there. I had often wondered what if the people who came from across the ocean, and likeminded people that welcomed innovation in Massachusetts had come to learn instead of to control. It's great. Can we start on the right foot now? I recommend the no action on behalf of Indian People's Action of Montana.

Dave: Hi, my name is Dave Dittloff. I'm the regional representative for National Wildlife Federation. Most of you are probably aware of National Wildlife Group. We're the folks who put on Ranger Rick Magazine. That's our biggest identifier here with the kids.

In 3, 4 years that that's going to take, yet there's nothing coming back up the streams in order to spawn salmon. The impacts are almost certainly down to relating to some of the impacts here. Last year, last summer's conditions literally had most of the species dying, most of the adults coming back to the rivers and streams here to the headwaters of the Columbia River Basin died due to high temperatures, directly related to climate change.

I want to talk a little about, quickly here's something that hasn't been hit hard today, talk about wildlife. It starts right from the beginning. You look at the mine site here, the direct habitat displacement, the coal recommendation that follows it, that impacts wildlife. If you look at what happens on the mine sites with water, that impacts fish and wildlife. The next connector we look at has it transferred over? We look at the trains. There's been a lot of talk about human health and consequences here which are really important. Those same impacts are related to wildlife for particularly the fisheries here. That coal dust gets in the streams. There's mercury concern with it here and other neurological issues are a concern.

Mercury is bad for people eating the fish as well. We've got dozens of streams and multiple dozens of lakes in Montana that had mercury consumption warnings here. You can only eat so much of the fish. That's an impact to wildlife. You look at the ports, same thing here. The direct construction of the ports, this place is habitat for sure. That has real consequences to the fisheries. You'll see salmon come in and out of the ocean as well here.

Lastly, climate change, I got to talk to you about salmon. Name a critter, even the biggest critters, white tail deer, elk, etc. that think generalist that those are for generalist. There's impacts here. More and more research that's done it's really impact of Montana's out pour heritage, it's culture, what we like to do here whether it's sightseeing, hunting, fishing, what have you here. Fishing is a multi-billion dollar industry in Montana and the Pacific Northwest. There's economic reasons associated with wildlife as well here. I appreciate it. No action alternative makes sense for wildlife.

Dave Jones: Hello, my name is David Jones. I've been a fly fishing guide in Montana for over 30 years. Dave just inspired me to get up here and talk about what I see in my career fishery that I work primarily in. My season has been shortened by an average of about 6 weeks in the 30 years I've been doing this. We don't have clients in August anymore at all because of

the low flows. Half the time our rivers are shut down because we have to worry about railing over there. Anybody that watches the forester around in the spruce moss and the beetle kill, it's just obvious that Montana is being really affected. We mentioned the economic impact, but really we're talking genocidal, ecocidal impacts for climate change. We ought to think in those terms really. This is an emergency. I recommend no action on the terminal. Thank you.

Steve: Hi, my name is Steve Schwartz. I live here in Missoula. I'm a professor interior of the Department of Communication Studies at the University of Montana. I teach and do research in environmental communication. No matter what the coal industry says about the free market, their goal is to get government on their side to make the market work for them whether it's supporting carbon cash receipt frustration, whether it's blocking the clean power plan, or supporting coal export infrastructure like MBT as a goal. It's past time for us to use our voice to remind government agencies who's side they need to be on and who's interest they need to represent.

The connected and key note we've heard about tonight on public health and safety, on air, land, and water, on wildlife, and on climate change are common in house. They're shared by the residents of the Pacific Northwest, shared in common by the people who live in Washington and Idaho and here in Montana. We all deserve a voice in this decision. For that reason, I want to thank all the organizations that have made this opportunity possible for so many of us to express our voices. To protect the commentators in the Department of Ecology, to take no action, thank you.

Jim: My name is Jim Roach. I've been a Missoula resident for 45 years. I don't understand why it's draft Environmental Impact Statement doesn't address impacts for rail traffic in Montana. That seems sort of ridiculous. It seems like a rip off. On behalf of my family, and my friends, and a lot of people that I know are neighbors, I just want to say we don't want any more coal dust. We don't want any more diesel fumes. We don't want any more threat of derailment. We don't want traffic complications from increased rail traffic. We don't want the noise.

Most of all we don't want the climate impact. We don't want the endless smoky summers. We don't want the low stream flows and the sick fish. We don't want the reduced fishing opportunities. We don't want increased beetle kill. We don't want disappearing biodiversity. We don't want damage to agriculture. We don't want the drought. We don't want climate refugees. We don't want shut downs of skiing areas. We don't want this action, no action. Thank you.

Claudia: My name is Claudia Narcisco. I am speaking for myself today. When I was trying to find some things that I was going to speak about, I found an old letter that I had written in I guess November 2013. There goes my letter. I had it on my phone and mailed it to myself. Anyway, it was hard enough to read. I emphasized that connection actions between the mine and the port and Asia and the impacts on climate change and how it would cycle back to us.

I requested that they consider this. I cited a section of the National Environmental Policy

Act. I believe it was section F2 or 2F that specifically directed agencies to consider international ramifications of actions which is not something that we normally associate with, but it's just that it was our responsibility to do that. Obviously those things were not necessarily done, as far as I could tell, to this point.

I hope that's considered.

Submission Number: ***MBTL-SEPA-DEIS-0001106***

Received: 5/24/2016 7:25:40 PM
Commenter: Phil Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. What most folks in Seattle tend to forget is that not everyone in Washington lives in Puget Sound. Not all of us work in the high-tech industry, and we still earn good livings as farmers, working at ports or in manufacturing. We make things, harvest and develop natural resources, feed our community and help facilitate trade in our great state. And we need more jobs like this especially in Cowlitz County where our unemployment rate is 8 percent. Millennium Bulk Terminals can bring great jobs to our county not to mention the much-needed tax revenues. Let’s not forget about how much time, effort and money Millennium has spent to clean up the port. Frankly, it was an environmental blight on our community, but now it will be a critical link for expanding trade for Southwest Washington. Again, having good jobs and protecting the environment can go hand in hand. Please reach out with any questions.

Submission Number: ***MBTL-SEPA-DEIS-0000499***

Received: 5/19/2016 1:08:51 PM
Commenter: Ron Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to comment on the draft EIS for this extremely important project. I have been waiting for this opportunity for a very long time, and having now reviewed the draft EIS, I can see why it has taken so long. You have taken an unnecessarily broad scope and studied each aspect of it to death. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough â€" now it is time to move forward with a fair process for permitting. I applaud the agencies work on this permit process. The results will provide a more-than thorough "hard look" at the possible impacts of the Millennium Project in Longview which is needed to keep things moving ahead. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001196***

Received: 5/26/2016 10:25:58 AM
Commenter: Rozanne Smith
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I request that you do not approve any facilitie that assist in exporting coal to regions outside of the US. Shipping dirty, pollution forming coal to other countries will not keep our country safe from the negative affects. Coal being shipped via rail to these proposed facilities will have a negative affect on my community of Missoula, Montana, increasing train traffic and coal dust in the air only a few blocks from my home. It is time for us to commit to non-polluting means of energy production in the U.S. and world-wide. Please deny the creation of this facility that will continue to impact our world in a dangerous way.

Smith, Scott (0030)

Submission Number: ***MBTL-SEPA-DEIS-0000030***

Received: 5/1/2016 4:18:10 PM
Commenter: Scott Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I write today in support of Millennium Bulk Terminals coal export terminal. This is a project that is easy to support because it will benefit families both within and outside of its southwest Washington location. The project presents a path to employment for many, let's makes it happen. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed Millennium Bulk Terminal would provide. The project would create work right away during construction, and plenty more jobs would stay around to run the terminal. Plus, all of those wages generated would trickle back into our local and state economies. At a time when our state unemployment rates are below the national average, we cannot miss big opportunities for new business like this one. I appreciate you considering this feedback. Sincerely, Scott Smith

Submission Number: ***TRANS-PASCO-Q3-00003***

Received: 6/2/2016 12:00:00 AM
Commenter: Scott Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Scott Smith, and I'm a small business owner. I live in Richland. And there is no way that this project would have any impact on my business. But I'm still strongly in favor of it. Not just because of the jobs and the tax benefits to the local communities where the new port will be and to the state, but also because America needs to have more exports.

America needs, specifically in the Pacific region, to have more influence and to better our trade balances. And this will help achieve all of that, and not just from an economic perspective, but I also think in a diplomatic and strategic prospective. This is a big win for America, and I'm strongly in favor of it.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001023***

Received: 5/24/2016 6:13:04 PM
Commenter: Sterling Smith
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm glad to have the chance to make a comment about this project as it's very important to me. Media coverage would have us believe that transporting coal by rail through our state is unprecedented, it's not. We've transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Submission Number: ***MBTL-SEPA-DEIS-0000117***

Received: 5/6/2016 6:40:36 PM
Commenter: The Smiths
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

As citizens of the Columbia Gorge, who live very close the train tracks that the 8-9 additional mile-long coal trains with uncovered coal cars would travel on every day, we whole-heartedly oppose the Millennium Coal Terminal. We cannot allow the beautiful area in which we live to become a dirty coal chute to Asia!

Submission Number: ***MBTL-SEPA-DEIS-0000412***

Received: 5/17/2016 6:30:29 PM
Commenter: Julius Smoak
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it's the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. Thanks for the ability to comment. I believe the final environmental review needs to be released ASAP!

Submission Number: ***MBTL-SEPA-DEIS-0003145***

Received: 6/13/2016 6:03:50 PM
Commenter: Mark Snapp
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0001441***

Received: 5/28/2016 5:38:08 PM
Commenter: Sharon Sneddon
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Now is the time to continue moving forward with our clean energy implementation and drop all proposals that would contribute to continued use of fossil fuels, both here and abroad. This project is the sixth proposed fossil fuel terminal in the Pacific Northwest; the other five have already been defeated. Clean air, water and land, healthy salmon streams, and safety are our top priorities. Those priorities would be jeopardized if this terminal is built. Deny all permits for the Millennium Bulk Fuels Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0003299***

Received: 6/13/2016 8:06:10 PM
Commenter: Greg Snider
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

If this terminal were built, its impacts would reach far beyond Longiew, WA. Your DEIS is oddly dismissive of the well-documented negative impacts about coal dust coming from train cars. Why is this? Especially when its well-documented that agents placed on top of the coal in open cars don't perform well on long-distance routes. And that coal dust in water, on land and in air is deadly. All of the communities' health that live along the trains running through many states would suffer. Respiratory health problems would increase in communities (including Longview) if this terminal were built. The cleanliness of our Columbia River would suffer from the dust, due to the short distance between the train tracks and the water. It will have negative impacts on salmon recovery, which WA and OR have spent a tremendous amount of money on - making it not just environmentally unwise, but fiscally unwise. As we recently saw with the train derailment in Mosier, OR, there is no way to guarantee train safety. Coal trains have no place in the Columbia River Gorge, with the tracks so close to our most important waterway - a coal train derailment is a real possibility that puts our river's and wildlife's health at risk. The increase in train traffic means (76) more trains daily on WA tracks - in addition to the coal dust pollution, that's a considerable increase in noise pollution for all of the many communities who live along the tracks. The terminal would more than double the trains moving through these communities - negative impacts will follow - the real estate will devalue in these communities. The City of Longview has no moral right to advance a project for only their own monetary self-gain, while plummeting neighboring communities land values and livability. One train every 7 minutes running through your community is not how any sensible town would choose to live. Moving this cargo would result in thousands more vessels in the Columbia River and in the Salish Sea - places where accidents would catastrophic and even without an accident, would devalue their beauty, placing recreation and tourism dollars at risk. This project will contaminate the Columbia Gorge National Scenic Area and violate the Clean Water Act. Environmental groups will pursue holding the project under that focus for that violation. And, as if all of these locally-focused points aren't good enough reasons to oppose this terminal, they dwarf in comparison to coal's contribution to climate change, which is and will continue to bring the most dire consequences upon us all, beginning by impacting the poorest and most economically vulnerable communities of the world first. Coal blackens our air and acidifies our oceans. How can a state with a border on the Pacific Ocean be considering a project as unwise as a coal investment in 2016? Our ocean fisheries are a huge part of WA and OR's economies and health. Coal is dirty and is dying as a source of energy - its in a economic plunge and will continue on that path. Longview needs to oppose this terminal based on a long-term economic view for its resident and its neighbors. Once Longview is a dirty coal town, and coal is phased out as an energy source (which is happening rapidly throughout the world), Longview will be vacated as a toxic town that went "all in" placing a bad bet on an obviously losing proposition. All for a ill-sighted gain of a few local jobs. Longview and the state of Washington would be far wiser to step up and bring the jobs of tomorrow's healthy economies to their town, than jumping on the sinking ship that is the coal industry. You owe it to not just neighboring communities like mine, but to your own community there in Longview. Please oppose the building of this terminal.

Submission Number: ***MBTL-SEPA-DEIS-0001425***

Received: 5/27/2016 11:39:25 AM
Commenter: Mark Snider
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Although I prefer this proposal be declined, IF it unfortunately is approved, then please at least require those who obtain profit to pay for the "Bridging of the Valley" thru Spokane, WA, and perhaps the length of the run from end to end. It would greatly address many of the concerns listed. Providing underpass/overpass would remove vehicle wait times at crossings, addressing EMT issues. No crossings would eliminate train whistle noise to address reduced property value concerns. I believe this is a reasonable "condition" to request of those who would so impact our communities for their own financial gain.

Submission Number: ***MBTL-SEPA-DEIS-0002495***

Received: 6/10/2016 3:14:45 PM
Commenter: Donna Snow
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Gentlemen, I support the “No Action” alternative for Millennium Bulk Terminals’ facility in Longview, WA. This marine terminal for export of coal has negative environmental and economic impacts that extend far beyond the marine terminal itself. This coal export terminal will harm community health and safety, air and water quality, and other natural resources for the local area, and would be contrary to clean energy and fossil fuel policies recently passed in Washington. The transport of coal by rail results in a coal dust trail for the entire length of the transport that cannot be completely contained. The rail system is not designed for this volume of trains and the impact to the safety of mile-long trains passing through our towns. We have only to look at the recent oil train wreckage near Mosier, Oregon that spilled oil on land and into the Columbia River. This marine terminal would impact fishing, recreation, and ecotourism that would support a sustainable economy for the region. Salmon are already endangered and do not need this terminal to further risk their survival. Exporting coal to Asia would make climate change and global warming even worse, impacting degradation of the health of our planet, humans, wildlife, and entire ecosystems. I urge you to stop the Millennium Bulk Terminals’ facility from moving forward. Sincerely, Donna Snow

Submission Number: ***MBTL-SEPA-DEIS-0002644***

Received: 6/13/2016 12:08:37 PM
Commenter: Martha Snow
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000050***

Received: 5/3/2016 1:35:36 PM
Commenter: Cary Snyder
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The hysterics used in attempts to block the transportation of a common worldwide commodity like coal means such objections and opposition based on wildly emotional and exaggerated reactionary comments should be dismissed and ignored. Such claims in the EIS could easily apply to all opposing all truck traffic on Interstate Freeway 5 and to every commercial and private ship on the Columbia River. The same logic could be used to oppose the transportation of ALL commodity products transported to and on the Columbia River like Grain, Timber, Fuels, food, vehicles, or essentially all commerce. The Department of Ecology State of Washington and local Cowlitz County Washington elected and serving Government Employees are not a the position to set or influence or make recommendations based on exaggerated claims without expanding and applying such opposition to every commodity product transported in the region. Any claim that coal is at all hazardous in bulk form is without merit as coal* and products make using coal is an essential component in many regional manufacturing operations. The use of coal in simple water filters is shown below. I implore that fair-use parameters be applied to the EIS including applying the same exaggerated claims to ALL commodity products transported to and from the Columbia River and recognized the importance of balanced regional commerce and the many good jobs such activities generate. *About bituminous coal based activated carbon Coal based activated carbon originates from coal that has undergone a steam activation process to create its activated carbon form. During activation, it creates millions of pores at the surface of the carbon thus increasing the total surface area. Activated carbon pores can be divided into three general sizes Micro-pores (diameter in the range of less than 2 nm), Meso-pores (diameter in the range of 2 – 25 nm), and Macro-pores (diameter in the range of above 25 nm). Coal based carbon has mainly meso-pores and macro-pores and due to its unique distribution of pores diameter, coal based activated carbon are very popular in the gas phase purification, potable water purification industries, wastewater purification industries and aquarium/pond water purification industries. - See more at: http://www.pelicanwater.com/blog/learn-about-pelican-carbon-water-filters/#sthash.rF9LkFbx.dpuf

Snyder, Chris (0686)

Submission Number: ***MBTL-SEPA-DEIS-0000686***

Received: 5/23/2016 12:32:23 PM
Commenter: Chris Snyder
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Moving this project forward is important to me, my family and my community. This project is exactly the kind of economic boost that the state really needs. The benefits are numerous. The terminal would create jobs, generate significant new tax revenue, and help attract businesses to our area. In many ways, it can be a source of continued growth for years to come. It is tough to believe that a project with an obvious upside like this has been held up for so long. Those in charge should view this project for its benefits to the community and see it through to the finish. Our citizens are counting on it. Please do not delay the permitting process any further. It is important to get people back to work. There are good jobs on the line and waiting on your review.

Snyder, Mark (0945)

Submission Number: ***MBTL-SEPA-DEIS-0000945***

Received: 5/24/2016 5:23:46 PM
Commenter: Mark Snyder
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The Department of Ecology should speedily complete the permitting for Millennium Bulk Terminals. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and should be treated as such. An environmental review of this time and scope should not have been needed to redevelop an old smelter site. The Draft EIS is sufficient, it’s time to move forward. I appreciate you considering this feedback.

Submission Number: ***TRANS-SPOKANE-Q4-00002***

Received: 5/26/2016 12:00:00 AM
Commenter: Thomas Soeldner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is W. Thomas Soeldner T-H-O-M-A-S, S-O-E-L-D-N-E-R. I am opposed to this coal terminal for a number of reasons.

First of all, I think it makes absolutely no sense for us to continue using coal as any kind of primary resource given the clear evidence that it is promoting global warming and health risks as well as damaging our environment in other ways as well.

Particularly for people in Spokane, there is the danger of the railcars coming through. We do not have adequate fire and emergency protection for the trains. I don't believe the number of trains that are projected, if the terminal is approved, could even come through Spokane in a single day.

Secondly, I'm very concerned about our waterways. The trains follow waterways, the Columbia River in particular. The coal dust from that, there's clear evidence and studies have been done to demonstrate that it pollutes.

I also do not understand people who talk about the jobs that it will bring to Washington because the number of jobs is relatively small and they are not jobs that are going to remain because coal is not going to remain as a resource in the future.

For all of those reasons, it makes no sense for the coal terminal to be approved or for us to continue to transport coal through the state of Washington. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000236***

Received: 5/10/2016 5:35:19 PM
Commenter: Louis Soha
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. Cowlitz County has a chronically high unemployment rate. There are environmental impacts of building trades and longshore workers having to travel as far as the Port of Seattle for work on a daily basis, instead of going to a job at Millennium. Let’s keep our jobs local! So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0000710***

Received: 5/23/2016 1:01:02 PM
Commenter: David Solliday
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The proposed coal export terminal at Longview should be approved. Millennium Bulk Terminals has a clear and environmentally-sound plan that will be studied to make this port a reality and it will do much to contribute to the economy and vitality of the region and the country. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. Thank you for taking my comment and for providing the opportunity to weigh in. I believe strongly in this project and hope that you will consider the strong commitment Millennium has made to restoring and protecting the environment in our community.

Submission Number: ***MBTL-SEPA-DEIS-0000712***

Received: 5/23/2016 1:02:50 PM
Commenter: David Solliday
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The proposed coal export terminal at Longview should be approved. Millennium Bulk Terminals has a clear and environmentally-sound plan that will be studied to make this port a reality and it will do much to contribute to the economy and vitality of the region and the country. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. Thank you for taking my comment and for providing the opportunity to weigh in. I believe strongly in this project and hope that you will consider the strong commitment Millennium has made to restoring and protecting the environment in our community.

Submission Number: ***MBTL-SEPA-DEIS-0000630***

Received: 5/20/2016 1:12:49 PM
Commenter: Robert Solum
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I write today in support of Millennium Bulk Terminals coal export terminal. This is a project that is easy to support because it will benefit families both within and outside of its southwest Washington location. The project presents a path to employment for many, let's makes it happen. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let’s get Millennium Bulk Terminals to begin hiring and exporting Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000218***

Received: 5/10/2016 4:59:16 PM
Commenter: Sid Somers
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Here are my comments on the Millennium coal export terminal. I support the project and the jobs and tax revenues it will provide. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it’s time Longview went back to work. The agencies are doing a great job of evaluating Millennium Bulk Terminals port proposal. I am convinced that this project’s permit should move forward without further delay.

Submission Number: ***MBTL-SEPA-DEIS-0001052***

Received: 5/24/2016 6:40:03 PM
Commenter: Kevin Sondrol
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The draft environmental study for Millennium Bulk Terminals coal export facility was sufficient. Please move forward. There are many benefits of the project that the community is waiting for. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Submission Number: ***MBTL-SEPA-DEIS-0002429***

Received: 6/9/2016 6:29:20 PM
Commenter: Kevin Sondrol
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn't have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. Thank you for your work to move forward with this project.

Submission Number: ***MBTL-SEPA-DEIS-0002894***

Received: 6/13/2016 3:02:21 PM
Commenter: Kevin Sondrol
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn't have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. Thank you for your work to move forward with this project. Sincerely, Kevin Sondrol hossond@westriv.com 58575

Submission Number: ***MBTL-SEPA-DEIS-0003259***

Received: 6/13/2016 7:17:26 PM
Commenter: Mireya Sorano
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscores my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. Washington has long depended on trade and exports as a vital part of our economy, directly and indirectly creating 40 percent of all our state's jobs. Ushering in developments like Millennium Bulk Terminals - now thoroughly reviewed and vetted - will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0003290***

Received: 6/13/2016 7:59:09 PM
Commenter: Mireya Sorano
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001830***

Received: 6/2/2016 5:44:01 PM
Commenter: Molly Sorensen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough now it is time to move forward with a fair process for permitting. Please reach out with any questions.

Submission Number: ***MBTL-SEPA-DEIS-0001330***

Received: 5/26/2016 7:04:13 PM
Commenter: Chris Sorenson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. Coal exports are a huge opportunity for the Northwest. The infrastructure coal companies are creating will expand trade of all kinds, from apples to software. At a time of increased competition from both West and East Coast ports, Washington needs to seize these opportunities to expand trade and create thousands of family-wage jobs. Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Submission Number: ***TRANS-LV-M2-00062***

Received: 5/24/2016 12:00:00 AM
Commenter: Allison Sosa
Organization: Greenpeace & Mosquito Fleet
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening. My name is Allison Sosa (phonetic). I'm a regional activist with Greenpeace. I'm also a member of mosquito fleet. I also work for legislative ballots in Portland trying to bring vocational training to high school students.

In nine months of canvassing in Longview, we have knocked on over 5,000 doors. And I personally can say 80 to 98 percent of the people are really receptive to the message that I have. Out of that I have seen large number of people talk about asthma. And in that time I've watched my own asthma increase to the point of having bronchitis three times in those nine months.

I have nebulizer treatments at least once a month, double doses twice. I'm suffering from it now. Both of my children have been here coughing because of the action in Anacortes because of the pollution. I fully support green jobs, things that will help the community. I'm compassionate to them. I have a bleeding heart for the residents of Longview and for the Pacific Northwest in general.

But what kind of living wages will workers earn if they are constantly sick? What kind of quality of life will they have paying for medical bills when they should be saving for their children's college and future? This can't go on anymore. We cannot keep making ourselves sick. We deny ourselves a future that is healthy and productive, if we allow projects like this to happen. We've shut down every major fossil fuel project in the Pacific Northwest. Let this be the last one we have to fight against. Our health is worth more, our children's future is worth more. We can't keep doing this.

Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0002623***

Received: 6/13/2016 11:39:17 AM
Commenter: Jared Sostrom
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I work for Powder River Energy Corporation, a rural electric utility in northeast Wyoming. Coal is an integral part of the economy of Wyoming. I support the Millennium Bulk Terminal as it will diversify US coal markets instead of limiting it to only local consumption. Many complain that the coal dust will be a nuisance and causes environmental concerns. I live and work within a 60-mile radius of 13 open pit coal mines. Coal dust should be an issue in my area more than a 190 acre site, especially since the average wind speed in Wyoming is higher than any other state. However, coal dust is not an issue by any means, and the air quality is better in Gillette, WY, than in large US cities. By contrast, the air is very clean in Gillette. Coal dust affecting air quality and the environment is not an issue. Coal is still a necessary part of the US economy, and this terminal will help support that. Until a reliable, affordable replacement for coal power is developed, coal needs to be maintained.

Submission Number: ***MBTL-SEPA-DEIS-0002303***

Received: 6/9/2016 5:02:33 PM
Commenter: Bridgette Spang
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close and move on to a permit decision. Washington is highly dependent on trade, and Cowlitz County desperately needs family wage jobs. An EIS that includes newly-invented forms of navel gazing should not have been necessary for a transportation infrastructure project that will facilitate foreign trade and create good jobs for our community. We need this project to move forward without further delays or unprecedented permit conditions. This is an old industrial property being redeveloped. Keep the review to what is normal and factual.

Submission Number: ***TRANS-SPOKANE-M1-00043***

Received: 5/26/2016 12:00:00 AM
Commenter: Ted Spangler
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. My name is Ted Spangle, and I'm from Superior, Montana.

I'd like to talk about the climate changing now. A lot of people don't want to believe that, but it's true.

On April 1st, we had 31 degrees in western Montana. This was the last frost we had this year. Normally we can expect frost into late May when we put in our tomatoes.

At our home last summer, we had smoke for nearly two months from the fires. Last winter, we had no hard freeze. Our apricots blossomed the first week in April, two to three weeks early this year. Memorial Day lilacs are dead. They're two to three weeks early.

The rest of the world, glaciers of Glacier Park are melting. Ninety degrees in early May, dry winds and fire caused 88,000 climate refugees in Alberta. It rained in the Arctic last winter. Northwest passage is open for shipping. For the second year in a row, people in India are dying from a heat wave, extreme storms are more intense and frequent throughout the world.

Globally, 13 out of 15 highest monthly temperatures in the record have all occurred since February of 2015, 13 out of 15 of the highest temperatures, and that's from NOAA. That's our government.

Climate is changing and changing now. Our free market casino is the cause. This is not just a scientific theory, it is an observed fact. You don't need a PhD in physics to know what's going on. You just need to have your senses and a little bit of common sense to see that. Thank you.

Burning more coal in Asia will only make the situation worse. Using Montana and Wyoming as a source of this carbon makes us a party to this folly - yet another fraud that destroys the place where we all live.
As we gamble with the lives of our young people and future generations, we are riding a runaway train that needs to stop now. The carbon needs to stay in the ground.

Choose the no-action alternative.

Submission Number: ***MBTL-SEPA-DEIS-0000191***

Received: 5/10/2016 3:51:01 PM
Commenter: Sally Sparhawk
Organization:
State: Colorado

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Coal is dirty energy, bad for the planet and all living things on it. Stop the terminal, please!!!

Submission Number: ***TRANS-SPOKANE-M2-00026***

Received: 5/26/2016 12:00:00 AM
Commenter: Jay Speilega
Organization: Sierra Club
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. My name is Jay Speilega (phonetic), and I work for the Sierra Club as an organizer. But I just couldn't sit idly in the crowd and listen any longer without really calling this jobs issue out for what it is, which is a lie.

Where are the jobs for Spokane? I do not know where any of these jobs are. And I've been working with the labor council here locally. The labor council is not here today. They know there aren't jobs for the Spokane region for this project. We want to work with them to create good jobs locally in the clean energy industry, and we can create a heck of a lot more jobs locally with solar power, wind power, energy efficiency for our buildings and homes especially as opposed to relying on the dirty 19th Century fossil fuel that's going to harm us.

And if anything it's going to create jobs for our medical profession, and we don't want that.

So thank you for your time and just remember also -- one point that I almost forgot to make, that when Millennium first proposed this project, they lied. They said they were going to build a five-million ton a year coal facility. And through; public records it was shown that they really wanted ramp it up to what would be the largest terminal in the continent. So they lied. So I don't believe a word they're saying. Thank you.

Submission Number: ***TRANS-LV-M2-00125***

Received: 5/24/2016 12:00:00 AM
Commenter: Spencer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Spencer. I support the no action alternative. In 2008, the governor appointed a working group providing a list of recommendations for how the SEPA process should incorporate climate change.

Notable points of what category the greenhouse gas emissions should be included in the SEPA are the following: Off-site mining of materials purchased for the project, transportation for raw materials for the project and transport of the product off-site, and use of those products sold by the proponent to consumers or industry.

The EIS should conduct a full analysis life cycle emissions of this project including an analysis of these points on cumulative greenhouse gas emissions. In addition, climate change cost us $1 billion last year, an incalculable loss of the ecosystem function and loss of life from increased frequency of national disasters such as the wild fires we saw last year.

We need to transition away from fossil fuels therefore a programatic opportunity cost and analysis for building infrastructure for this project as opposed to comparable investment in any clean energy project should be included any sort of economic consideration in the final analysis.

And these are things that I have had to sort of work through, I didn't understand which had to do with when the years for construction, beginning and ending would be. It almost seems as if as a mitigation measure remediation of the site itself could be included because a reasonable foreseeable impact of this project is that it will be decommissioned in a short time.

Any sort of market analysis of coal in the long term cannot be supported. It doesn't make sense economically and citizens could end up with a 190 highly developed site with no use of it. The impact is significant and cannot be mitigated. There was (inaudible) in the DEIS in addition to all of the ones you've heard tonight that were not listed and hopefully will be in the final DEIS.

Thank you.

SPENCER, KENNETH (0332)

Submission Number: ***MBTL-SEPA-DEIS-0000332***

Received: 5/11/2016 2:41:58 AM
Commenter: KENNETH SPENCER
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and wan to underscore my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing market, thereby spurring greater investments at home. Washington has long depended on trade and exports as vital part of our economy, directly and indirectly creating nearly 40 percent of all of our stat's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0000333***

Received: 5/11/2016 2:44:08 AM
Commenter: NATALIE SPENCER
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and wan to underscore my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing market, thereby spurring greater investments at home. Washington has long depended on trade and exports as vital part of our economy, directly and indirectly creating nearly 40 percent of all of our stat's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0003048***

Received: 6/13/2016 5:02:07 PM
Commenter: PeggySue Spencer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm glad to have the chance to make a comment about this project as it's very important to me. What most folks in Seattle tend to forget is that not everyone in Washington lives in Puget Sound. Not all of us work in the high-tech industry, and we still earn good livings as farmers, working at ports or in manufacturing. We make things, harvest and develop natural resources, feed our community and help facilitate trade in our great state. And we need more jobs like this especially in Cowlitz County where our unemployment rate is 8 percent. Millennium Bulk Terminals can bring great jobs to our county not to mention the much-needed tax revenues. Let's not forget about how much time, effort and money Millennium has spent to clean up the port. Frankly, it was an environmental blight on our community, but now it will be a critical link for expanding trade for Southwest Washington. Again, having good jobs and protecting the environment can go hand in hand. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed. Sincerely, Peggy Sue Spencer 151ferncrest@gmail.com 98632

Submission Number: ***TRANS-LV-Q1-00049***

Received: 5/24/2016 12:00:00 AM
Commenter: Paul Spindell
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Paul Spindell, and I'm a resident of West Linn, Oregon, and I come here knowing that I don't live in Longview, but the decisions being made with regard to the coal facility impacts the entire Northwest. Earlier today there have been comments about how many jobs would be added by this and permanent jobs, looking at the data that was presented, is about 135 jobs. I'm just wondering if those are worth the risk. A gentleman today said jobs are the foundation for a house, if you will. I would disagree with that. The Earth is the foundation and that foundation is in trouble. In Portland, recently we had two instances where companies promised safety and mitigation for the things that they were dealing with in their manufacturing processing. Both of them, Precision Cast Parts and Bullseye Glass, have been cited numerous times for significant violations. Tests recently conducted at a daycare center near Bullseye Glass found toxic levels of several chemicals generated at Bullseye. The best way to mitigate the risks that we have with the coal plant is to not have coal brought here in the first place. That is the best and only true way we can mitigate the risks of coal damage to the people involved. Earlier today there were elected officials speaking on behalf of the coal plant for the sake of jobs. One of the things I wonder is are we holding them accountable to work hard to create jobs that are sustainable and also healthy for the people in their districts? What are they doing to recruit companies that provide jobs and reduce harm to the foundation of our lives, Mother Earth? I have to say I found objection to part of the process today. In the beginning of both sessions, the CEO for Millennium was given first place to talk on behalf of the project. There was no other opportunity presented to a person from the opposing, from the no-action view, to have that same time, and I found that troubling in the process when we're talking about an equitable process. And lastly, let me just leave you with this poem, if you will. I know that the DEIS does not make recommendations and all of that, and we have to stay within our charter. Well, there's times to break those rules. The poem I'm going to read is one that was presented to me years ago and had a significant impact on my life. What did you do once you knew? It's 3:23 in the morning and I am awake because my great-great grandchildren won't let me sleep. My great-great grandchildren ask me in my dreams what did you do while the planet was plundered? What did you do when the Earth was unraveling? Surely you did something when the seasons started failing, as the mammals, reptiles, birds were all dying. What did you do once you knew? That's by Drew Dellinger. I encourage all of you to read that. So another thing I would like to talk about is one of the things we should be trying to look at is quality of the organization that is proposing all of this and trying to figure out whether we should allow to do this, and so one question came up to me as I talked to the people from Millennium. I come from a human resources background and I would encourage whoever the officials are here to encourage the State Labor Department, if you will, to investigate whether the people who are here, employees of Millennium are being compensated for their time here. Because a number of them were told they were encouraged to be here. My reading of most State labor laws that would be required to be compensated, and I wonder if that's being done. If not, I wonder if that's the kind of company we want to be doing business with. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000387***

Received: 5/16/2016 11:30:03 PM
Commenter: Andrew Spiteri
Organization:
State: Michigan

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Climate change is the most important and dangerous issue humanity has ever faced. The effects of climate change are starting to be worse than what's been predicted in models by decades. Researchers have even found that permafrost is beginning to melt ahead of schedule. This could mean an unstoppable positive feedback and dangerous climate change. Preventing any type of fossil fuel consumption should be of the utmost importance to everyone.

Submission Number: ***TRANS-LV-Q2-00010***

Received: 5/24/2016 12:00:00 AM
Commenter: Cathy Spofford
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

So my name is Cathy Spofford, and I live in Portland, Oregon. I'm a mother, grandmother, and retired social worker. Last week I saw a movie called, How To Let Go of the World and Love All Things That Climate Can't Change. In one part it featured the city of Beijing, China where children can't play outside, where people drive a few blocks to stores instead of walking and where people have apps on their phones to check the air quality before going outside. All of this is a result of the transportation and burning of coal. Coal is the number one source of air pollution in China and contributes to hundreds of thousands of deaths each year. This is not the type of world I want my grandchildren to live in. Exporting coal to Asia from Longview will not only make things worse in Beijing, but in the Northwest and around the world by contributing to greenhouse gases and global warming. Just by transporting millions of tons of coal a year, this project undoes the clean energy and fossil fuel transition policy recently passed in Washington state. Coal dust from open rail cars would impact community all along the rail lines, the air quality, the water quality as well as spreading coal dust on homes and cars. Coal dust, especially fine coal dust, has been identified by health professionals and doctors around the world and causing a range of diseases and health problems, the asthma, bronchitis, and cancer. The World Health Organization has stated, There may be no safe threshold for fine particulate matter and the effects are linearly related to concentration. The final Millennium Bulk Terminal EIS should look at real world examples of coal dust pollution communities with terminals and more closely at the health and environmental impacts of such a facility.

Submission Number: ***MBTL-SEPA-DEIS-0002737***

Received: 6/13/2016 1:56:52 PM
Commenter: Mike Sporcic
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits.We need jobs for WA. Please help us get them going. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002849***

Received: 6/13/2016 2:47:31 PM
Commenter: Mike Sporcic
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits.We need jobs for WA. Please help us get them going. Thank you

Submission Number: ***TRANS-LV-M2-00008***

Received: 5/24/2016 12:00:00 AM
Commenter: Ted Sprague
Organization: Cowlitz Economic Development Council
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening. My name is Ted Sprague (phonetic). I live in Longview, raising a family here in Longview, and I'm president of the Cowlitz Economic Development Council. Thank you for providing this forum for citizen input.

After a four-plus year process and over 215,000 comments during the scoping period and now these three hearings and additional time, 45 days, I think it's safe to say that more than enough time has been adequate to make comments either here tonight or in writing if you couldn't make it.

I believe the Draft EIS is thorough and is a complete document. I do have a couple of areas of concern. One, when we, as a state, ask companies to mitigate for the uses of a product they do not own, it begins a slippery slope for companies that manufacture or distribute all types of product.

How soon until we make a demand for Boeing to mitigate for the jet fuel burned in the airplanes they manufacture? Is it a matter of time before we demand Amazon to study the amount of pollution they create by the distribution of the product bought at their Website?

I have heard many times the phrase, We can do better by people who are against this project. I do agree when it comes to timeliness and consistency on how we permit things in Washington state. Companies we're recruiting are paying more attention to this permit process than whether or not a coal exporter locates here.

This process, not coal, is what has discouraged companies to want to locate in the state of Washington. From today forward, for the sake of future job creation and capital investment, I ask for timely and consistent process.

Thank you very much.

Submission Number: ***TRANS-LV-Q2-00002***

Received: 5/24/2016 12:00:00 AM
Commenter: Ken Spring
Organization: Weyerhaeuser
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Ken Spring, and I've lived in Longview for 73 years. And I've seen jobs come and go and mostly go here lately. I've worked at Weyerhaeuser for 33 years, and they burned coal the whole time I was there. There were trainloads of it came in. I didn't see any problem with it.

And as far as Weyerhaeuser burning coal, most of the people have no idea that they do because they have scrubbers that scrub all the bad stuff out, and there is no smell or anything. And I believe the residue is reburned again.

And so, this area needs jobs. And it seems like everybody is protesting everything nowadays. And like I said, I've lived here 73 years. I built a new house. And if I thought there was going to be coal dust all over, I would definitely be against it. But I have been places where there is coal being handled up in Canada and around, and I know that that's a falsehood about there being a lot of coal dust.

And the railroad trains running north and south, you can see the coal trains going all the time. And you don't see any dust coming off of them. I can't understand -- it seems like people are protesting everything nowadays. People were trying to stop oil trains here a while back, but I noticed that they drove their cars there.

And I just wonder what people want. For us to go back to the horse and buggy days and ride horses and carry a six gun? I don't understand the big deal with this. The EPA -- the Washington EPA and the Federal EPA has very stringent rules. And they were down at Weyerhaeuser checking all the time to make sure that they met their standards. And I am sure they will at Millennium.

Millennium is saturated with all kinds of contaminants that will cost millions and millions of dollars to clean up. And I am tickled pink that Millennium is going to take that on, because that's a terrible mess.

In my younger days I used to hunt out there and saw the terrible sludge ponds, and the smell and everything was terrible. So we definitely need the jobs. These people that are opposed to it, most of them have no idea what they're talking about. They're opposed to everything.

And there's going to be a lot of good paying jobs associated with this. They're going to be under close scrutiny and as far as the railroad cars coming in, I'm sure there are going to be overpasses, underpasses or something so people will not be held up for a long length of time.

I live within three blocks of Millennium. And I think that they have been very good neighbors, and I support their cause 100 percent. Coal is an asset that we have here. And if we don't use it, it doesn't make good sense to me. I think I've said enough. To close, I'm 100 percent for them getting their permit.

Submission Number: ***MBTL-SEPA-DEIS-0001878***

Received: 6/2/2016 6:25:23 PM
Commenter: Dave Spromberg
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Millennium Bulk Terminals has proposed a coal export terminal at Longview that is both environmentally-sound and economically beneficial. I ask that you approve this project and the environmental study without delay. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. It is important that regulatory agencies keep the playing field level by being fair and consistent. The permitting process for this coal export terminal should be similar to other export terminals.

Submission Number: ***MBTL-SEPA-DEIS-0000269***

Received: 5/10/2016 6:30:26 PM
Commenter: Wesley Sprunk
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for this opportunity to voice my support of Millennium Bulk Terminals - Longview project. This port will benefit the economy of the region, and that of the nation. Unlike many port operations, Millennium occupies a location without immediate residential neighborhoods, AND it is an existing brownfield site. It should be understood that alternate locations do not exist for situating an export coal facility with the necessary water and rail access without gentrification impacts

Submission Number: ***TRANS-LV-M2-00082***

Received: 5/24/2016 12:00:00 AM
Commenter: Ryan Spurea
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi, name is Ryan Spurea (phonetic). I live here in Longview. I was born and raised in Kalama. I have a beautiful wife at home and a six-month-old baby. And I've been laid off for the past month. I haven't been able to support my family like I should be able to. My wife is a stay-at-home mom as she should be and things are just really hard.

This job -- or this plant will give three years of construction that I can use to support my family. So I am totally for it. And I hope you guys pass it.

Thanks.

Submission Number: ***MBTL-SEPA-DEIS-0001103***

Received: 5/24/2016 7:23:51 PM
Commenter: Delores Spurlock
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. This draft EIS is exhaustive and quite frankly, overreaching. For instance, because the proposal is a terminal proposal, the use of the bulk commodity by a third party is a superseding and intervening cause to the combustion of coal. As a result of these superseding causes, the construction and operation of the terminal is not a proximate cause of the combustion of coal. Enough already! Millennium Bulk Terminals EIS should be thorough but held to the same standards as any other port proposal. We need to do everything we can to strengthen and grow the economy of Washington and the west in general. The project proposed will do just that. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000546***

Received: 5/19/2016 5:53:27 PM
Commenter: Barbara Squier
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on Millennium’s application.

Submission Number: ***MBTL-SEPA-DEIS-0001242***

Received: 5/26/2016 6:14:10 PM
Commenter: George Squier
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. In Longview, 56% of kids need free and reduced price lunch at schools and go home to neighborhoods facing 8% unemployment. We cannot afford to look the other way when projects in this area guarantee new jobs and private investment in our schools, roads, and local services. In fact, the estimated number of jobs related to construction activity at the Millennium Bulk Terminals project is 1,350 temporary direct jobs - that will mean $70 million in direct wages! When the project is completed there will be about 135 direct jobs and about 165 indirect jobs. These numbers simply cannot be ignored. Remember this project’s economic benefits to the local community. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium’s proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0001860***

Received: 6/2/2016 6:09:13 PM
Commenter: Robert St.Germain
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Moving this project forward is important to me, my family and my community. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview's quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. Thanks for considering my comments.

Submission Number: ***MBTL-SEPA-DEIS-0001293***

Received: 5/26/2016 6:46:04 PM
Commenter: Harry Stahl
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing about the Millennium coal export project. I believe this project is good for the community. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don’t hold them up any longer.

Submission Number: ***MBTL-SEPA-DEIS-0002063***

Received: 6/7/2016 4:27:48 PM
Commenter: Scott Staiger
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. Unlike many port operations, Millennium occupies a location without immediate residential neighborhoods, AND it is an existing brownfield site. It should be understood that alternate locations do not exist for situating an export coal facility with the necessary water and rail access without gentrification impacts

Submission Number: ***MBTL-SEPA-DEIS-0001210***

Received: 5/26/2016 2:47:13 PM
Commenter: Natalie Stameroff
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Burning coal and other fossil fuels has fueled many economies around the world for hundreds of years. This can no longer be the case if humans wish to continue inhabiting this planet in the same manner. The climate is changing and humans are causing this earth to become uninhabitable for every living thing, including ourselves. We must invest in renewable and sustainable energy sources and discontinue the old paradigm of fossil fuel economies. We can create jobs in renewable energy sectors and building infrastructure that will support our transition off of fossil fuels. We can create an economy that is not dependent on another country buying our coal. This looks like putting research and money into clean energy. This will create more stable, healthier jobs for people and our home, this planet. We must be the ones to make the shift to compete for the cleanest energy, not the most profitable in the short term. The demand for clean energy far surpasses the demand for coal. As we saw in the climate summit in Paris in December of 2015 we know that the world wants and needs to shift to clean energy and we must take that seriously. We are very close to surpassing the holding capacity for carbon in our atmosphere and unless we make a drastic shift there will be no going back. This is the most dangerous problem that humanity has ever faced. The profits will not mean anything because we will be living on a planet where we cannot grow our food, drink clean water, breathe clean air. The ecosystem will collapse around us and humans will go with it. Please, for the wellbeing of all living entities on this planet do not continue to expand our coal industry. We have the capacity to act. We must make the shift to cleaner and renewable power NOW. Please investigate: http://thefilm.thischangeseverything.org/about/

Submission Number: ***MBTL-SEPA-DEIS-0001211***

Received: 5/26/2016 2:47:13 PM
Commenter: Natalie Stameroff
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Burning coal and other fossil fuels has fueled many economies around the world for hundreds of years. This can no longer be the case if humans wish to continue inhabiting this planet in the same manner. The climate is changing and humans are causing this earth to become uninhabitable for every living thing, including ourselves. We must invest in renewable and sustainable energy sources and discontinue the old paradigm of fossil fuel economies. We can create jobs in renewable energy sectors and building infrastructure that will support our transition off of fossil fuels. We can create an economy that is not dependent on another country buying our coal. This looks like putting research and money into clean energy. This will create more stable, healthier jobs for people and our home, this planet. We must be the ones to make the shift to compete for the cleanest energy, not the most profitable in the short term. The demand for clean energy far surpasses the demand for coal. As we saw in the climate summit in Paris in December of 2015 we know that the world wants and needs to shift to clean energy and we must take that seriously. We are very close to surpassing the holding capacity for carbon in our atmosphere and unless we make a drastic shift there will be no going back. This is the most dangerous problem that humanity has ever faced. The profits will not mean anything because we will be living on a planet where we cannot grow our food, drink clean water, breathe clean air. The ecosystem will collapse around us and humans will go with it. Please, for the wellbeing of all living entities on this planet do not continue to expand our coal industry. We have the capacity to act. We must make the shift to cleaner and renewable power NOW. Please investigate: http://thefilm.thischangeseverything.org/about/

(Multnomah County)

My name is Orly Stampfer, I have a bachelor's degree in Environmental Science from Columbia University, and this fall I will enroll in the University of Washington for a Masters in Public Health.

The draft environmental impact statement states that arsenic is one of the pollutants that would continue to be introduced as a result of the proposed action in Longview and along the tracks. While the DEIS states that estimated maximum concentrations of arsenic will be lower than acceptable source impact levels, recent studies published in journals such as Environmental Health Perspectives suggest that arsenic is harmful to human health at lower levels than previously thought, including increased risk for skin and lung cancer. Low levels of exposure to arsenic are particularly worrisome for pregnant women and children. Recent studies show that exposure to arsenic in the womb and in early childhood may cause decreased fetal growth and adverse epigenetic effects.

The risk of exposure to arsenic and its toxicity is further supported by the CDC's Agency for Toxic Substances and Disease Registry – arsenic has been ranked number 1 on that agency's Substance Priority List since 1997, and before that it was second only to lead. Government standards for allowable levels of arsenic in water have already been lowered by 80% in the last 16 years as evidence has grown demonstrating toxicity at lower levels of exposure. This evidence will likely continue to grow. Changing standards remind us that just because existing standards may be met, that does not mean public health will necessarily be protected. This has come up time and time again. How will increased exposure to arsenic impact environmental justice communities living closest to the train tracks and to the terminal? We respectfully request that this information be disclosed in a high-quality Health Impact Assessment with a public review.

Please select the No Action Alternative and protect the public health of Longview and environmental justice communities. Thank you.

Submission Number: ***TRANS-LV-M2-00002***

Received: 5/24/2016 12:00:00 AM
Commenter: Arlene Stanford
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm Arlene Stanford (phonetic) from Multnomah County. I have a Bachelor's degree in environmental science from Columbia University. And this fall I will enroll in the University of Washington for a Master's in public health.

The Draft EIS states that arsenic is one of the pollutants that would continue to be introduced as a result of the proposed action in Longview and along the track. While the DEIS states that estimated maximum concentrations of arsenic will be lower than acceptable source impact levels, recent studies published in journals such as Environmental Health Prospective, suggest that arsenic can harm human health at lower levels than previously thought, including increased risk for skin and lung cancer.

Low levels of exposure to arsenic are particularly worrisome for pregnant women and children. Recent studies show that exposure to arsenic in the womb and in early childhood may cause increased mortality rate and adverse epigenetic effects.

The risk of exposure to arsenic and its toxicity is further supported by the CDC's Agency For Toxic Substances and Disease Registry. Arsenic has been rated number one on that agency's substance priority list since 1997. And before that it was second only to lead.

Government standards for allowable levels of arsenic in water have been lowered by 80 percent in the last 16 years as evidence has grown demonstrating toxicity at lower levels of exposure. This evidence will likely continue to grow.

Changing standards remind us that just because existing standards may be met, it does not mean that public health will necessarily be protected. This has come up time and time again, heavily increased exposure to arsenic impact environmental justice communities living closest to train tracks, hence the terminal.

We respectfully request that this information be disclosed in a high quality health impact assessment for public review. Please select a no action alternative and protect the public health of Longview and the environmental justice community.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000843***

Received: 5/24/2016 12:37:32 PM
Commenter: Hal Stange
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. MBT has received a thorough and comprehensive draft EIS reviewâ€"one five years in the making. If we don’t take the next step forward and turn this vision into a reality, it’s going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed. Sincerely, Hal Stange halstange@gmail.com 98626

Submission Number: ***MBTL-SEPA-DEIS-0000844***

Received: 5/24/2016 12:38:47 PM
Commenter: Hal Stange
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. MBT has received a thorough and comprehensive draft EIS reviewâ€"one five years in the making. If we don’t take the next step forward and turn this vision into a reality, it’s going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed. Sincerely, Hal Stange halstange@gmail.com 98626

Submission Number: ***MBTL-SEPA-DEIS-0002221***

Received: 6/7/2016 7:34:22 PM
Commenter: Hal Stange
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. Current world markets and decision in East Asia re capital allocation over the last decade demonstrate that American coal exports are not necessary to, nor causally-related to, decisions in China, Korea or Japan to build coal-fueled power generation capacity. The environmental impacts will occur regardless of Cowlitz County and Ecology decisions to grant permits for construction of the project-specific docks and terminals in question. When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003050***

Received: 6/13/2016 5:04:53 PM
Commenter: Hal Stange
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment.

Submission Number: ***MBTL-SEPA-DEIS-0003052***

Received: 6/13/2016 5:05:54 PM
Commenter: Hal Stange
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. This draft EIS is exhaustive; there is nothing further to study. Coal is an abundant commodity that moves freely in a global market. Asian economies consumed over 5 billion tons of coal in 2012 without any exports through Washington ports. Additional supplies to feed that market are coming on line from Australia, Indonesia, South America and Mongolia, and domestic supplies in China are becoming more readily available. Assuming that incrementally new GHG releases will result from some portion, or all, of future coal exports from a new terminal in Longview Washington that, at maximum capacity, would amount to less than 1% of Asian coal use, requires a degree of speculation that is not permissible under SEPA or NEPA. The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality. Sincerely, Hal Stange halstange@gmail.com 98626

Submission Number: ***MBTL-SEPA-DEIS-0001452***

Received: 5/29/2016 2:54:08 PM
Commenter: Barbara Stanley
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please do the right thing and NOT allow this dirty terminal. I live in Vancouver and love the clean air we have. We don't need coal dust coming thru, and endangering everything from animals to humans. Let's make this world as clean as possible for our people now and our upcoming generations.. I've seen people with lung issues, having a hard time breathing. We don't need more of it.

Submission Number: ***MBTL-SEPA-DEIS-0000069***

Received: 5/3/2016 6:37:06 PM
Commenter: Becky Stanley
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

If you take global warming fully into account you will have no choice but to say no to this terminal. This is the hottest spring on record in the Pacific Northwest and we are only going to get hotter. If you don't take global warming completely into account as a cost of this project, you will be making an irrevocable mistake for future generations. Additionally coal dust cannot be adequately mitigated across the length of the tracks and around the coal terminal. It is a basic human right to breath air that is not polluted. This coal terminal has no ability to adequately keep coal dust out of our communities. Please reject this project. Thank you for your time, Becky Stanley

Submission Number: ***TRANS-LV-M2-00087***

Received: 5/24/2016 12:00:00 AM
Commenter: Roy Staples
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Roy Staples. I'm a Kelso resident, and I work with foster children and the working class families. As I read the DEIS I was very disappointed. As we heard somebody say earlier that coal dust is just not an issue.

Well, the DEIS might just lead them to believe that because it says it's not a factor, but what does it base that decision on? It bases it on the fact that it is not regulated. Unfortunately, coal dust is real.

The other thing is that the pollution that this project will create is just within our ancient 1970s standards. So it passes muster, but that doesn't mean that it doesn't pollute. In fact, if it was in Europe it wouldn't pass muster. Does that mean Europeans are better than us? And as the gentleman said earlier, the WHO regulations are even more strict.

So I guess I feel that this DEIS is ignorant of reality. Just because the regulations are not there doesn't mean that nobody is going to be affected and that there's no pollution. And just because Millennium gets in just below the line doesn't mean that there's no pollution.

So I demand that there be a comprehensive health impact assessment based upon the people that live closest to the area, namely the Highlands neighborhood. Because I have knocked on their doors and I have talked with them. Anyway, no action on this, please.

Submission Number: ***MBTL-SEPA-DEIS-0001679***

Received: 5/31/2016 6:39:31 PM
Commenter: Len stark
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium's proposal is unprecedented and has far reaching economic implications. The opening of Millennium Bulk Terminals proposed coal export facility will have a significantly positive impact not only on the state of Washington but the entire country. So I not only urge you to keep this permitting process moving forward at an efficient pace, but to also to accept the DEIS as sufficient. Thank you.

Starshine, D. (0495)

I am commenting on the Millennium Bulk Terminals-Longview (MBTL) because the coal trains from Powder River Basin will come through Montana. The increase in train traffic endangers all of us from derailments (nationally trains carrying dangerious materials derail every two weeks) to rail crossings that hold up emergency vehicles. I have a lung condition, COPD, and the increased coal dust (present even after coal is sprayed) will certainly affect me as well as many others. Please deny permissiion for MBTL to be enlarged.

Dr. D. Starshine
1200 32nd St. S. #23
Great Falls, MT 59405

dr.starshine@gmail.com
406-788-2299

D. Starshine

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MAY 09 2016

Submission Number: ***MBTL-SEPA-DEIS-0002462***

Received: 6/10/2016 2:11:22 PM
Commenter: Michael Steele
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing about the Millennium coal export project. I believe this project is good for the community. Regulators have been looking at this project for years, and it's time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments, it's time to let it. Thank you for taking my comment and for providing the opportunity to weigh in. I believe strongly in this project and hope that you will consider the strong commitment Millennium has made to restoring and protecting the environment in our community.

Submission Number: ***MBTL-SEPA-DEIS-0001447***

Received: 5/29/2016 11:27:45 AM
Commenter: Charles Steen
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Ladies and Gentlemen, there is no public value to the proposed coal trans-shipment facility; it should not be built. The US should not be promoting the further use of fossil fuels anywhere in the world and the potential dangers of their movement by rail or ship are well documented. Assurances by businesses of safety measures are worthless. We are inundated daily by media accounts of business and industry failing to maintain the care needed to avoid public harm by their actions. Business' actions are driven solely by profit motivation, not the public welfare. The supposed economic advantages of this proposal are also bogus in that the development of renewable energy sources would also create many new jobs. Please disallow this entire proposed project. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001840***

Received: 6/2/2016 5:54:10 PM
Commenter: Alicia Steere
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please consider my comments on the DEIS of the proposed Cowlitz County coal export terminal. This is an excellent project and one that will bring broad-ranging economic benefits to Washington and to the national economic outlook for years to come. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied â€" get on with it already. The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward.

Submission Number: ***MBTL-SEPA-DEIS-0002282***

Received: 6/9/2016 4:50:31 PM
Commenter: Alicia Steere
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. The economy depends on trade. It creates jobs working the railroads and ships, loading cargo at the ports, growing crops for export, and building the infrastructure necessary to support a trade-based economy. However, trade depends on permitting approval to construct this infrastructure. If the federal, state, or local government apply different permitting standards to projects exporting coal, they are creating a dangerous precedent that will make it hard to build new infrastructure needed to export other goods, like wheat or manufactured products. The environmental groups have a long history of challenging trade based projects in the northwest, such as Columbia river dredging, new rail facilities and/or export terminals. Governments shouldn’t threaten trade or the jobs that depend on it. Thank you for accepting comments for this important proposal. The Millennium project will do a great deal for the economic outlook of this country. Let's get Americans back to work!

Submission Number: ***TRANS-LV-Q3-00021***

Received: 5/24/2016 12:00:00 AM
Commenter: Andrea Steig
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. My name is Andrea Grace Steig. I'm from Seattle, but Longview is my dad's home town. My grandfather worked for the timber industry his whole career and was safety engineer for Weyerhaeuser. I wouldn't be his granddaughter if I stood up for an unsafe industry.

It is unsafe for Longview. The noise and unsightliness and health risks will keep down the local economy and in an era in which Peabody Energy and Arch Coal, the financial backer of this project declares bankruptcy, we cannot trust Millennium Bulk to cover maintenance and healthcare.

It is an unsafe industry to the mining and transport communities who are fighting desperately to stop the project in their homelands and to depend on us here to support them.

External costs and health concerns extend over a long term, one that the Draft EIS does not but should take into account. The effects of climate change are currently being felt in communities all over the world, but they're fullest extent 20 years from now and 100 and 200 cannot be accurately calculated. For the potential risks involved in this project, I advise the no action alternative.

Submission Number: ***MBTL-SEPA-DEIS-0000891***

Received: 5/24/2016 4:53:02 PM
Commenter: Mark Steiner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please move forward with the government’s environmental study. I say let's get moving with the Longview port ASAP. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn’t have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. Enough with the schedule delays, bring this process to a close.

Submission Number: ***MBTL-SEPA-DEIS-0003226***

Received: 6/13/2016 7:00:21 PM
Commenter: Don Steinke
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

If the hearings officer has any doubt about climate change, watch this 3 minute science experiment proving that CO2 traps heat. https://www.youtube.com/watch?v=kwtt51gvaJQ Or this Tedx Talk at the evergreen State College Climate Change is Simple 15 minute video https://www.youtube.com/watch?v=pznsPkJy2x8 or Myth busters https://www.youtube.com/watch?v=pPRd5GT0v0I We have spent billions monitoring glaciers, ice sheets, sea ice, sea level rise, atmospheric CO2 levels, ice cores, and global temperatures, but all we really needed to know was that CO2 and methane are greenhouse gases That was discovered nearly two hundred years ago. http://esrl.noaa.gov/gmd/aggi/aggi.html http://climate.nasa.gov/evidence/ I urge you to reject the coal terminal proposal because it may already be too late to avoid catastrophic climate change. The targets set by the IPCC are not adequate and projects like Millennium BT take us in the opposite direction. 50% mitigation is not adequate.

Submission Number: ***TRANS-LV-M1-00032***

Received: 5/24/2016 12:00:00 AM
Commenter: Don Steinke
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Hello. I'm Don Steinke, S-T-E-I-N-K-E. I'm a retired physics teacher from Vancouver. I'm here on behalf of my grandson. How in the world could any commissioners think a coal terminal would serve the greater good unless they were willfully ignorant. There's no way that you would support this coal terminal if you understood climate change. Co2 is a greenhouse gas. You can prove it for yourself. Take two bottles half full. One with plain water and one with club soda. Stick thermometers through the cast. Shine a spotlight on both, and the one that's carbonated will get much warmer in about an hour. Corporations are required to put shareholders first, but it's up to elected officials, who I don't see on the stage, to look out for other stakeholders, such as the children sitting in Longview Public Schools right now. I strongly support the Department of Ecology's proposal that at least 50 percent of the greenhouse gas be mitigated. The steelworker's union says, Unrestrained growth in greenhouse gas emissions posed a threat to our economy. Teamsters president James Hoffa said, Global warming is for real. Air pollution is killing people and making our children sick. If we are to prosper as a nation we need to pursue a clean economy. AFLCIO president John Sweeney told the United Nations global warming means global depression. Michael Bloomberg was the mayor of New York City for 12 years. He said the cost of inaction is too high. And the supporters of this project are saying, we support all energy projects, no questions asked. End your willful ignorance and choose the no agency alternative. Thank you.

Submission Number: ***TRANS-LV-M1-00070***

Received: 5/24/2016 12:00:00 AM
Commenter: Floda Steinki
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. My name is Eloda Steinki. I'm a retired RN from Vancouver. One need not be a healthcare provider or professional to realize that breathing air or drinking water contaminated with mercury, arsenic, and lead is a very bad idea. These are the toxins in the thousands of pounds of coal dust lost from each train on every trip through the Gorge in spite of the surfactant that's sprayed on the open cars. Each mile-and-a-half-long train has four diesel engines that emit toxins and dangerous particulates. The effects in all this pollution is an increase in heart disease, stroke, respiratory illness, increasing asthma attacks, cancer, and developmental problems. Pine Ridge, South Dakota, Camden, New Jersey, Southern West Virginia, and Flint, Michigan. These are examples of sacrificed zones, parts of the country that have been offered up for exploitation in the name of profit and progress. These are places where human beings and the natural world are used and then discarded, permanently impaired by environmental damage or economic divestment. Cowlitz County has a high rate of asthma and hospital admissions for asthma. The death rate for chronic lower respiratory disease in this county is 54 percent higher than statewide. According to the Cowlitz County Community Index Scores, the rates of unemployment and poverty and poor health in general are much higher here than across the state or the nation. These rates would surely climb even more with the reference of a huge open coal pile. Please perform a cumulative health impact assessment and deny this project and prevent Longview from becoming the next sacrificed zone. Everyone who opposes this project please raise your hand.

Submission Number: ***TRANS-SPOKANE-M1-00055***

Received: 5/26/2016 12:00:00 AM
Commenter: Stephanie
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Hi. My name is Stephanie, and I live in Pasco, Washington.

I wasn't sure if I supported Millennium Bulk Terminal at first. I have six kids and there are concerns there, and so I did a little bit of research, and I actually went to BNSF and wanted to see the trains in action, and I wanted to see how that facility was run, and I was able to go on a tour. It wasn't an extensive tour, but they showed me where they did the spray. It was so impressive.

I thought with a 4,000-page EIS, I don't know how much thorough you can get, and then to have that come back and say that there's no concern with the coal dust, that was a very large factor for me. So that is one of the main reasons that I do support Millennium.

And then I was also impressed by the fact that Millennium has said -- well, it also said in the EIS that they will comply, and they will negate all of the environmental standards. I think that Washington, the environmental standards are set really high. I was very impressed by that. I know the operation of Millennium is not going to cause climate change, so the operation of that facility is second to none.

We've heard a lot about the 16 trains, the increase and, I guess, my feelings on that were in talking to BNSF --

EVENT HOST: Your time is up. We appreciate the comments.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Don Stephens
908 SE Cora
Portland, OR
97202

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☒ Air Quality
- ☒ Human Health
- ☒ Rail Transportation
- ☒ Vessel Transportation
- ☐ Vehicle Transportation
- ☒ Coal Dust
- ☒ Greenhouse Gas
- ☒ Climate Change
- ☐ Plants and Animals
- ☒ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

I am opposed to this terminal for a multitude of reas
both specific and broad-based. I live in Portlan
I own property in the Gorge near The Dalles, and I a
a frequent and long term (30+ yrs) recreationist in the Gorge.
Coal transport through the Gorge is already beginning
to impact the environment of the Gorge and the
massive increases proposed will greatly expand
the injuries. The inevitable accidents involved in

(additional space is provided on the back)

(comment continued)

transport will only increase the injuries. In addition, coal trains in general as well as accidents will diminish the value of my property in the Gorge.

As far as recreation in the Gorge, the existing coal trains, let alone the large increases proposed, already diminish the experience. The trains will further limit access to the Columbia for windsurfing and kayaking - sports I have engaged in for more than 30 years. Beyond access the massive increase in trains (spreading coal dust) will reduce the enjoyment of the experience of the outdoors in the Gorge - it is a recreation mecca attracting enthusiasts from around the world.

Outside the Gorge, the massive increase in trains is bad for Longview (overburdening the rail system, disrupting traffic, impacting disproportionately on the poor) Washington (noise and traffic delays, more accidents, impact on endangered salmon - for which we have already spent mega$$$ - and just dirty, industrial dust spread throughout the state, both chronically every day and acutely when each inevitable spill happens.

In the largest perspective, these proposed trains will greatly contribute to climate change - just when we are beginning to make progress to slow its damaging effects. We should look to the future, not the past.

Submission Number: ***MBTL-SEPA-DEIS-0000713***

Received: 5/23/2016 1:03:42 PM
Commenter: Christine Stephenson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The proposed coal export terminal at Longview should be approved. Millennium Bulk Terminals has a clear and environmentally-sound plan that will be studied to make this port a reality and it will do much to contribute to the economy and vitality of the region and the country. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it's time to move forward. Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Submission Number: ***TRANS-LV-M2-00029***

Received: 5/24/2016 12:00:00 AM
Commenter: John Steppert
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm Reverend John Steppert. I live in Longview. As a local faith leader, I'm not convinced that Millennium understands the proven science that global warming is caused by the burning of fossil fuels.

All world religions urge us to protect the environment and quality of life for all living creatures, yet Millennium's very presence here ignores the current ecological crisis that could threaten the very existence of the human species.

This is a very pregnant moment for our universe, our state, and region. We can come here today but not ignore or deny the fact that climate change is one of the most pressing problems facing the planet.

In a recent study that came out this week proves and points out that unless we stop sending carbon into the atmosphere, the temperature will rise as much as 12 degrees. It is estimated that the coal exported from the Malian facility will emit an additional 27 million tons of carbon into the atmosphere annually.

That is outrageous and immoral. I am not surely convinced that Millennium cares about the cries of humanity and the environment. I am not convinced that they care about our children, and grandchildren, and great grandchildren's qualities of life in the future.

Furthermore, Millennium ignores the urging of the Paris Climate Agreement and our Administration's Clean Power Plan to pursue clean energy options. Millennium also ignores Longview's quality of place value that has long defined the quality of life we all aspire.

I want to thank both Departments of Ecology for making this time for public comment available, and I support the no action alternative.

Thank you.

Sterrett, Robin (2764)

Submission Number: ***MBTL-SEPA-DEIS-0002764***

Received: 6/13/2016 2:14:32 PM
Commenter: Robin Sterrett
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002884***

Received: 6/13/2016 2:59:27 PM
Commenter: Robin Sterrett
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. Please do not delay the permitting process any further. It is important to get people back to work. There are good jobs on the line and waiting on your review. Sincerely, Robin Sterrett robin.montana@gmail.com 59323

Submission Number: ***TRANS-PASCO-M2-00006***

Received: 6/2/2016 12:00:00 AM
Commenter: Steve
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you. My name is Steve. I'm from Pasco. I'm on the Pasco School Board. I don't have a lot of prepared remarks. I just want to tell you, though, that I am in favor of this terminal.

As you know, our legislature has been wrestling with how we're going to pay for school and school systems and education in our state.

As I look at this and I see the tax revenue that will be generated in the construction of this facility and in follow-up construction, other jobs support this, I am definitely in favor of this.

If we can't get projects like this going in our state, it will affect not only construction, other commercial ventures like this, but tax revenue will be impacted for a long time.

So I would appreciate it if we could get this moving and moving quickly and other projects like this that might be held up by this Environmental Impact Statement. It looks like this one has been vetted pretty thoroughly, so I would encourage you to move forward with this.

Submission Number: ***TRANS-SPOKANE-M2-00043***

Received: 5/26/2016 12:00:00 AM
Commenter: Steven
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi there. My name is Steven (inaudible). I'm here representing BNSF Railroad. I have three sons who have worked for BNSF for all of those years. I'm here to voice my support for this project, for union jobs.

This country, if you look around the county, you see that middle class is shrinking everywhere. And we need these jobs, we need the tax base.

(Inaudible) informed me that laid off co-workers, probably 80 right here in Spokane. They all need to come back and support their families. These are jobs that every city that these trains would be running through, they run them very efficiently, the engines have gotten way more fuel efficient, and like I say, the longshoremen that run the facility, lots of union labor will be involved in this. And I'm here to support that.

And, like I say, we run our trains and we've been shipping coal through here. I've been working for the railroad for 27 years. We run coal through here for a long time. We ran coal through here probably today. And I've never had dust on me. Like I say, I'm worried about other things that we're shipping that we're not talking about today. So I've run trains, I've ran them -- as they say, that's a hot topic, and I don't know what the next one is going to be. But this is good jobs. And this city, this state, we need these jobs.

What kind of message are we sending to people who are in business to our export facilities in this state? We're going to tell them that no, we don't want your business? Where do you draw the line when you decide what we will and won't ship? That's all I have to say. Thank you.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

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Written comments can be submitted a number of ways:

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- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☒ Air Quality
- ☒ Human Health
- ☒ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☒ Coal Dust
- ☒ Greenhouse Gas
- ☒ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

- Coal dust + diesal contaminants are health hazards.
- Coal Burning = global warming, we need to take action now.
- Rail transportation will create traffic congestion chaos
- There is a LOT of work to be done — let's put our money into funding jobs for renewable energy + safe environme
- Governments need to take the long range planning for outcomes, which citizens may not understand with their personal & short term concerns.

(additional space is provided on the back)

(comment continued)

- Millenium application bias in their favor shows public long term concerns are being discounted.
- NW is an environmental jewell to protect for the future — and it can be its own economic boon with tourism industry and its rich resources for fish + water quality.
- No standards in construction + operation can overcome the known risks + known outcomes. Don't fool yourself with justification due to needing a job. It's a no win (we can do better) situation!
- Policy is moving now towards "leave it in the ground" + recognizing the science behind global warming. To build this terminal at this time is blind sighted + a step backwards for our planet. Don't do it!
- And fire risk by coal dust spontaneous combustion!! What next? Too much RISK, Sally J. Stevens

Submission Number: ***TRANS-SPOKANE-Q1-00004***

Received: 5/26/2016 12:00:00 AM
Commenter: Ann Stevenson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Ann Stevenson and I am here to protest the Millennium Bulk Terminal. I think that global warming and climate change has made it so we cannot be mining coal or any other fossil fuel any longer.

And I would like to speak to the group that is pro the project because their signs all say, Washington jobs. And I think it's interesting because really, we could have a lot of jobs if we go into solar and wind technology and if we renovate our homes, put in new windows, you know, more insulation in our roofs.

And we can also do lots of restoration work on all of those strip mines that they have in Montana, and Wyoming, and everywhere else. So it seems we would have plenty of work and get rid of the dirty fuels that are polluting our lungs, which are important to me as a nurse. I have seen a huge increase in asthma over the last 40 years that I've practiced.

So that is why I'm against the terminal and why we should not provide more access to put coal through.

Submission Number: ***TRANS-LV-Q3-00038***

Received: 5/24/2016 12:00:00 AM
Commenter: John Stevenson
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is John Stevenson. I live in Portland. I'm from Pennsylvania.

The entire process of coal from mining as a combustion is bad for the environment and bad for communities.

I went to Penn State University and some of my colleagues there will be spending their entire careers trying to fix impacts of coal mining, specifically acid mine drainage. And the heavy metals that are given off by coal combustion and the greenhouse gases we'll be dealing with for centuries.

Yes, this project may produce dollars, jobs on the short term, but how long will those dollars last? Will they last centuries?

We've known that coal was a mistake for 150 years now. It's been around, you know, since the 1800s. My grandfather was a coal mine inspector and he died of lung cancer.

I focus mostly on the impacts of combustion and mining, but transporting it outside of the country is a key link in that chain. We should make decisions for the 21st Century, not 1800s solution.

I saw an article just today from Forbes or Fortune Magazine that China actually has more coal than they need, and they have a five-year plan to cut back on production. Why would we be sending coal to them?

And the coal production in the United States is down because the price is down. This is not a forward-thinking conclusion.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

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Does your comment relate to one or more of the following areas?

- [x] Noise
- [x] Air Quality
- [x] Human Health
- [x] Rail Transportation
- [x] Vessel Transportation
- [x] Vehicle Transportation
- [x] Coal Dust
- [x] Greenhouse Gas
- [x] Climate Change
- [x] Plants and Animals
- [x] Marine Species, Fish, or Fisheries
- [x] Wetlands or Streams
- [x] Water Quality
- [x] EIS Regulatory Process
- [ ] Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

I live along the rail way where these trains will travel. The rail traffic over the years has increased to intolerable levels even without this project. With this me and my neighbors will be subjected to even more exhast, dust and noise. Climate change is real and as a national priority we must consider it very high on our list. We have

(additional space is provided on the back)

(comment continued)

Steward, Mark (3724)

an obligation to leave a planet that is habitable to future generations. Please Reject this project!

Mark Steward
Spokane WA 99204

Submission Number: ***MBTL-SEPA-DEIS-0002154***

Received: 6/7/2016 6:40:42 PM
Commenter: Sam Steward
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

This project will be a great thing for Longview! Jobs are needed here more now than ever!! I need one of these jobs myself!! I live right around the corner from this site & I'm all for this new company's project get started & bring more jobs to this area!

Submission Number: ***MBTL-SEPA-DEIS-0001965***

Received: 6/6/2016 2:13:48 PM
Commenter: Bethany Stewart
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn’t have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Stewart, Bethany (2375)

Submission Number: ***MBTL-SEPA-DEIS-0002375***

Received: 6/9/2016 5:57:43 PM
Commenter: Bethany Stewart
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Allow me to submit my comments regarding Millennium Bulk Terminals proposed port at Longview. I fully support this project. Please commit to a timetable for the issuance of a final EIS. Ecology's SEPA Rules require a final EIS to be issued as close as possible

Submission Number: ***MBTL-SEPA-DEIS-0002143***

Received: 6/7/2016 6:31:28 PM
Commenter: Bob Stewart
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. Cowlitz County continues to have a high unemployment rate. We need these jobs and we've paid a high cost with this drawn out permitting process so far. It's time to stop the delay and bring about development and economic relief. This is an old industrial property being redeveloped. Keep the review to what is normal and factual.

Submission Number: ***TRANS-LV-M2-00089***

Received: 5/24/2016 12:00:00 AM
Commenter: Bob Stewart
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you. Hello, I'm Bob Stewart (phonetic). I live in Yacolt, I grew up in Amboy, my phone number is La Center, and I work in Longview. I also spent the first half of my life in Wyoming around the Gillette area. So, I'm familiar with all of the aspects of coal mines, and coal trains, and everything that has to do with coal.

Longview is really a unique place. It's home to hard working people who just want a shot to provide for their families. That is what Millennium is offering. In the right location the site is an unutilized port right now.

Adding more industry right in here makes sense. The town wants it. The site is perfect for a terminal and Millennium is ready to invest more than half a billion dollars to make it happen. The EIS states they can do it.

While meeting the state's strict environmental standards, what also makes sense is granting the permits before the work begins. Please expedite this process.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000104***

Received: 5/5/2016 9:43:51 PM
Commenter: darrin stewart
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close â€" and move on to a permit decision. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). I greatly appreciate you considering my input. Sincerely, Darrin Stewart

Stewart, Darrin (1029)

Submission Number: ***MBTL-SEPA-DEIS-0001029***

Received: 5/24/2016 6:17:11 PM
Commenter: Darrin Stewart
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium's proposal. Now that the rail corridor has been studied, now it's time for progress on the Millennium project! I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001347***

Received: 5/26/2016 7:10:45 PM
Commenter: Dorie Stewart
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. Regulators have been looking at this project for years, and it’s time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments it’s time to let it. We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don’t hold them up any longer.

Submission Number: ***MBTL-SEPA-DEIS-0001977***

Received: 6/6/2016 2:24:37 PM
Commenter: Dorie Stewart
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. I support Millennium Bulk Terminals site in Cowlitz County. These trains are no different than the coal cars we've transported through our state for many decades. In reality, not one ton more of coal will be used globally because of U.S. exports, and the net gain in greenhouse gas emissions is insignificant. If we don't build these terminals, energy suppliers will just look elsewhere for their supply! I sincerely appreciate the opportunity to submit these comments on the Draft EIS. Let's get this project moving forward so there are more good-paying jobs in the U.S.A.

Submission Number: ***MBTL-SEPA-DEIS-0002091***

Received: 6/7/2016 4:54:26 PM
Commenter: Dorie Stewart
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. MBT has received a thorough and comprehensive draft EIS review one five years in the making. If we don’t take the next step forward and turn this vision into a reality, it’s going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***TRANS-SPOKANE-M2-00057***

Received: 5/26/2016 12:00:00 AM
Commenter: Mark Stewart
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. Thanks for being here. My name is Mark Stewart, and I live here in Spokane. I live very close to the train tracks, which are also very close to Lake Tongue Creek and the Spokane River.

So I'm not sure how many people who are for this project live really close to these train tracks that, you know, are in our neighborhood, but I can tell you that I definitely do. And our neighbors are extremely concerned about having increased train traffic, dust. We're talking about more particulate matter. Just all these things that can happen here in Spokane. And what do we get for it?

Well, an increase in global warming? We get an increased chance of acid rain, mercury coming down in the form of acid rain.

I don't -- I just don't see the cost benefit here for Spokane. So, since we're in Spokane I think that's what's really relevant.

I guess in Longview we can talk about jobs because that's where the jobs are going to be. I don't see a lot of people working on the railroad other than repairing the railroad, because it's being overused as it is.

Coal is not the future. So Washington state needs to lean forward and be part of the future. Coal is the past. So what we should be focused on in Washington -- and I know the Department of Ecology is part of this -- as a Washington state agency should be leaning forward for forward-leaning technologies. Clean and renewable energy, not coal, which is the past.

Again, you know, I mentioned I live along the railway. And I just want to point out, I have asthma. A lot of people have asthma, so...

EVENT HOST: We appreciate your comments. We'll take the next speaker.

Submission Number: ***MBTL-SEPA-DEIS-0000103***

Received: 5/5/2016 9:43:05 PM
Commenter: Robert Stewart
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water â€" coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! We need to move this project along. Thank you for your consideration. Sincerely, Robert A. Stewart

Submission Number: ***MBTL-SEPA-DEIS-0002755***

Received: 6/13/2016 2:11:51 PM
Commenter: Robert Stewart
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0002996***

Received: 6/13/2016 4:26:22 PM
Commenter: Robert Stewart
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000639***

Received: 5/20/2016 1:26:02 PM
Commenter: JOHN STILLMAN
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on the DEIS of the proposed Cowlitz County coal export terminal. This is an excellent project and one that will bring broad-ranging economic benefits to Washington and to the national economic outlook for years to come. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied â€" get on with it already. I appreciate you considering this feedback.

Submission Number: ***MBTL-SEPA-DEIS-0002287***

Received: 6/9/2016 4:53:09 PM
Commenter: Kathy Stinson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. I'm certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

Submission Number: ***TRANS-LV-Q3-00020***

Received: 5/24/2016 12:00:00 AM
Commenter: Carly Stiverson
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. My name is Carly Stiverson from Portland, Oregon. Water is a sacred part of life source for all life forms. The health of the Columbia River and its watershed is vital to maintaining thriving life systems from multitudes of species. Contaminating this water with coal dust will reduce the oxygen available to fish, barnacles and larvae. These species are vital for recreation, it's worst economy, and subsistence fishing.

Water moves and changes, seeps into soil and gets uptaken by plants and food we eat. Coal dust from trains and from runoff will not just stay in a mild radius of the coal site. The water will take it wherever it flows.

Life systems are not stagnant. They are moving and deeply connected and intertwined and molded by these life systems. We are not separate from nature. We are a vital part of it. It is an incredible responsibility to take care of it and thus take care of ourselves in all we cherish. I reject the Millennium Coal Terminal in Longview.

Submission Number: ***MBTL-SEPA-DEIS-0003234***

Received: 6/13/2016 7:03:07 PM
Commenter: Blake Stock
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life. Sincerely, Blake Stock stockbs@gmail.com 99301

Submission Number: ***TRANS-PASCO-M1-00049***

Received: 6/2/2016 12:00:00 AM
Commenter: Frank Stock
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Hello, My name is Frank Stock (phonetic), and I live in Pasco, Washington. I support Millennium because it creates jobs for those who need them. The DEIS is thorough and complete. It is time to move on to the final EIS and approve the permits for this project.

Thank you.

Submission Number: ***TRANS-PASCO-M1-00048***

Received: 6/2/2016 12:00:00 AM
Commenter: Jay Stock
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
My name is Jay Stock (phonetic), and I live in Pasco, Washington. I support Millennium mainly because of -- it simply allows us to increase jobs. The Draft EIS analysis is thorough and complete. It is time to move on to the final EIS and approve this project.

Thanks.

Submission Number: ***TRANS-PASCO-M1-00046***

Received: 6/2/2016 12:00:00 AM
Commenter: Julie Stock
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. My name is Julie Stock (phonetic), and I'm from Pasco. I support this Millennium project. I've heard about the train traffic and that. I actually personally would welcome more train traffic. And I have a lot of children. And have deadlines and have to get places. But to me, train traffic is America. Train traffic is industry. It's commerce. It's growth. It's jobs. It's families. It promotes what America is. And I also support this because of all the job increase that it will provide. So thank you very much.

The Draft EIS analysis is thorough and complete. It is time to move on, please. It's been going on for a long time. For final EIS approve the permits for this project.

Thank you for your time.

Stoddard, Cindy (2617)

Submission Number: ***MBTL-SEPA-DEIS-0002617***

Received: 6/13/2016 11:36:15 AM
Commenter: Cindy Stoddard
Organization: Powder River Energy Corporation
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I support this project!

Stoddard, Thad (3359)

Submission Number: ***MBTL-SEPA-DEIS-0003359***

Received: 6/13/2016 10:02:18 PM
Commenter: Thad Stoddard
Organization: Powder River Energy Corp
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Please save our Wyoming coal industry!!

Stodola, Janette (0307)

Submission Number: ***MBTL-SEPA-DEIS-0000307***

Received: 5/10/2016 7:41:59 PM
Commenter: Janette Stodola
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. Raising a family is tough, and this economy is not making it any easier. That’s why we need to capitalize on any opportunity that we have to provide good-paying jobs that can support a family. The Millennium Bulk Terminal project will create jobs that can help families give their children the head-start that they need. There are men and women throughout the state that are waiting for the chance to work hard for their families. It simply makes no sense to turn them away at this point. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0001224***

Received: 5/26/2016 6:03:48 PM
Commenter: John Stolte
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

There's no time like the present to support the draft study as it relates to the port at Longview. We need the economic boost this port will provide and the world needs American coal. Ultimately, global warming and the impact of fossil fuels on the environment are national government and international government issues and did not need to be studied in this DEIS. Now that it’s done, let’s move on to the final EIS! We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don’t hold them up any longer.

Submission Number: ***MBTL-SEPA-DEIS-0002066***

Received: 6/7/2016 4:29:46 PM
Commenter: D Stone
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly OPPOSE the project and the lies about thousands of jobs it will bring. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will wreak havoc on existing rail transportation infrastructure that is part of an already overburdened nationwide commercial transportation system. Thank you for accepting comments for this terrible project. Please Stop this terrible idea to make a few people rich.

Submission Number: ***TRANS-LV-Q1-00044***

Received: 5/24/2016 12:00:00 AM
Commenter: Joel Stone
Organization: IBEW Local 48
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Okay. My name is Joel Stone and I'm a member of IBEW Local 48. I've lived in Longview the majority of my life. The only time I haven't is when I had to travel to work to support my family. I currently drive to Tacoma five days a week. After hearing the testimony of the previous speakers against this state of the art coal export terminal, I started to ask myself questions. The first it how did all of these protesters get here? Did they emit carbon dioxide and drive to our community or did they ride horses? Do they drive hybrids and know that amount of mining needed to produce lithium for the batteries installed in those cars? These are the facts. Nearly everything humans do has an effect on our environment. You don't want coal burning, what are the side effects of nuclear plants? You don't want them to leak radiation or damage or erode fish species or windmills that kill birds. Your battery-operated cars also cause pollution. As far as Cowlitz County having a higher rate of health concerns, I don't believe industry is a scapegoat. You go to California and on every public building you enter it states, This building is known to contain cancer causing chemicals in the state of California. The previous tenant that Millennium currently occupies was an aluminum smelter with a massive demand for energy. This proposed facility will be less harmful and more beneficial to the residents of Cowlitz County. Look around, we have a mint farm that peaked out ten years ago. Opportunities to improve our schools and roads as well as expand businesses in the local area are far and few. I, my family, and friends, and the community as a whole deserve the opportunity to increase our current standard of living right here at home, and a diamond standard coal export facility is what we will gladly take. Please, if they don't live here, don't let them have a say. As a coal export facility will undoubtedly be built somewhere else just like it was with the prison. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000324***

Received: 5/11/2016 2:12:53 AM
Commenter: MIKE STORM
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I want to voice my support for the proposed Millennium Bulk export facility in Longview. I want to commend you for such an in-depth environmental review. With this exhaustive review, I am confident that the project will meet Washington's already high environmental standards. However, we must also keep in mind our economy and the livelihoods of our citizens. The Millennium terminal will positively impact Washington for years to come. Additionally, the tax revenues from the project will support projects and services for the state's citizens. The project also offers an opportunity to expand our ports, ensure that jobs are created and [reserved, stimulate growth in the local and regional economy. Thank you for considering my comment.

Submission Number: ***MBTL-SEPA-DEIS-0000604***

Received: 5/19/2016 6:57:09 PM
Commenter: Orland Storts
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My comments pertain to the draft EIS for the Longview coal export facility. I hope you will give them good consideration. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don’t hold them up any longer.

Submission Number: ***MBTL-SEPA-DEIS-0000726***

Received: 5/23/2016 1:21:56 PM
Commenter: Charles Stottlemeyer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close and move on to a permit decision. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0000288***

Received: 5/10/2016 7:06:58 PM
Commenter: Colleen Stout
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Department of Ecology should speedily complete the permitting for Millennium Bulk Terminals. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium’s proposal. Now that the rail corridor has been studied, now it’s time for progress on the Millennium project! Cowlitz County is fraught with uncertainty. Millennium’s proposal, however, offers all the economic benefits of a long-term port facility without any of the uncertainty. Coal is needed by other countries to help shape their future and enhance their quality of life. Let's give other countries the living standards we have for ourselves.

Submission Number: ***TRANS-SPOKANE-Q2-00001***

Received: 5/26/2016 12:00:00 AM
Commenter: Brenda Strange
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
My name is Brenda Strange. I oppose the Longview terminal and the coal trains because of the environmental catastrophe that could happen and the long-term environmental damage from the coal and the coal dust. And that can get into the water and affect the wildlife, not to mention human beings.

Submission Number: ***MBTL-SEPA-DEIS-0000312***

Received: 5/11/2016 12:37:33 AM
Commenter: Alex Street
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am opposed to the terminal. This would lead to a range of environmental costs in Montana, Idaho and Washington, in additional to the impact of burning the coal on global air pollution. More coal trains running through my city means more dust, noise, pollution and congestion. It is unacceptable that coal companies make money on selling the coal without compensating citizens for these environmental costs. Economists recognize this as an "externality," and argue that regulation can lead to more efficient and just outcomes. In this case, no permit should be provided. Rather than paying all of the costs for this old and dirty industry, we should be investing in the growing clean energy sector.

Submission Number: ***MBTL-SEPA-DEIS-0001366***

Received: 5/26/2016 7:21:53 PM
Commenter: Paul Strickland
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for this opportunity to voice my support of Millennium Bulk Terminals - Longview project. This port will benefit the economy of the region, and that of the nation. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. Cowlitz County is fraught with uncertainty. Millennium’s proposal, however, offers all the economic benefits of a long-term port facility without any of the uncertainty. Coal is needed by other countries to help shape their future and enhance their quality of life. Let's give other countries the living standards we have for ourselves.

Submission Number: ***MBTL-SEPA-DEIS-0002748***

Received: 6/13/2016 2:08:43 PM
Commenter: Jarold Strickler
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The God who created the Heavens and the Earth and holds all things together by the Power of His Might has given us liberty so that we may be fruitful and multiply, producing the abundance that He has designed into the world. The Millennium Bulk Terminals will be a valuable asset in enabling the productivity of the Northwest to be efficiently distributed to a needy and hungry world; thus contributing to the great work that the Almighty wants to accomplish in our day. Please allow this project to become a reality soon. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000314***

Received: 5/11/2016 1:29:31 AM
Commenter: JERRY STRICKLER
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and wan to underscore my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing market, thereby spurring greater investments at home. Washington has long depended on trade and exports as vital part of our economy, directly and indirectly creating nearly 40 percent of all of our stat's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***TRANS-PASCO-M1-00065***

Received: 6/2/2016 12:00:00 AM
Commenter: Jerry Strickler
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. I'm Jerry Strickler (phonetic), an engineer who's worked here in Hanford for 30 years. And I'm very disappointed because there's so much bad science that's being promoted by people with other alternatives and opinions rather than using the truth as a basis.

As an engineer, truth is a vital item that is required in order to build and make things that work and are safe. I'd like to inform you that carbon is not a bad substance. Carbon is vital for our life on this planet. Without carbon we wouldn't exist.

The God who created the heavens and the earth and brought this to life, and given us life, he has designed the world so that it can overcome the so-called pollution from carbon. And it's not as harmful as so many people like to believe and promote. Therefore, I want you to approve this Millennium project.

Thank you.

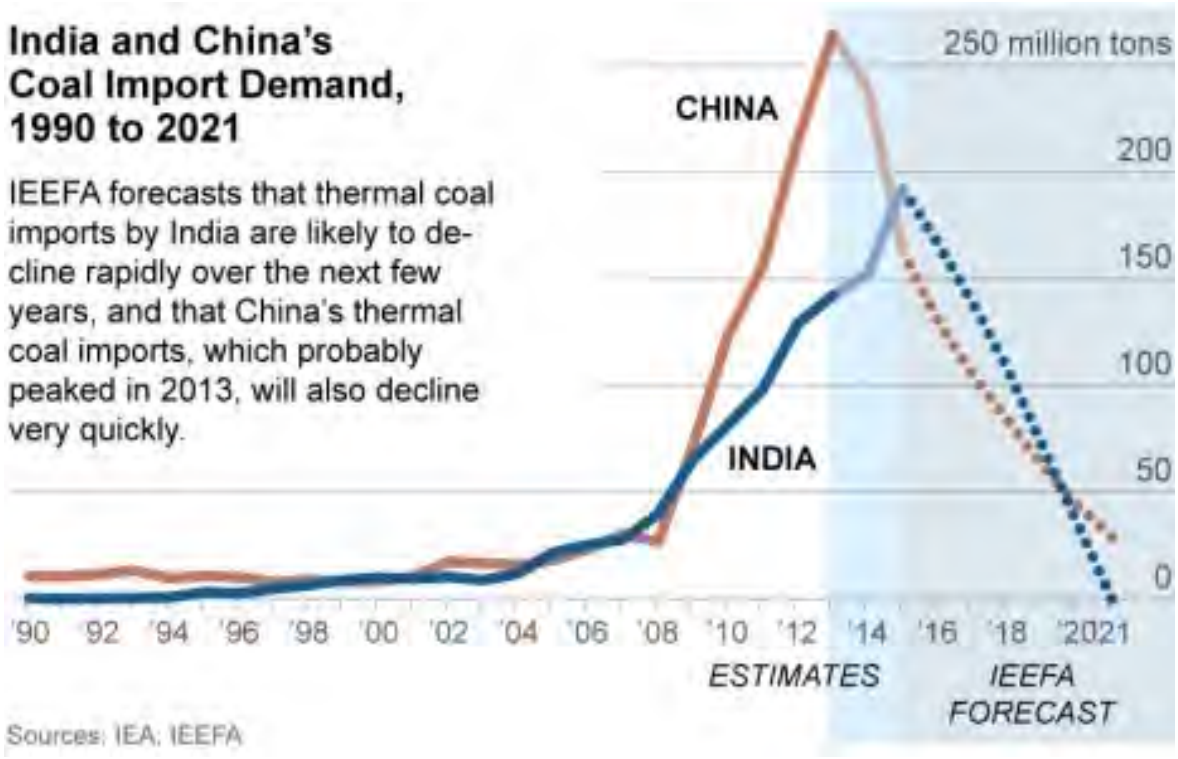
160612 Eric Strid comments on the MBTL DEIS

S.3 Applicant's Project Objectives

The Project Objectives are to:
- Enable western U.S. coal to compete in the Pacific international coal supply market,
- Diversify Washington State's trade-based economy, and
- Reduce local unemployment.

Given that the global demand and price for coal continue to decline while clean-energy alternatives continue to improve, none of these objectives are likely to be achieved. *This project is already a stranded asset, even before the EIS is done.*

The DEIS is deficient in its use of outdated market data in the SEPA Coal Market Assessment Technical Report. For example, Figure 12 shows China coal imports rapidly rising through 2012, while in fact those imports peaked in 2013 and have declined since then. India was supposed to ramp up its coal imports, but the latest forecasts (and news reports) show both China and India coal exports dropping dramatically[1]:



[1] http://ieefa.org/indias-new-emissions-target-adds-momentum-to-global-energy-transition/ (Oct. 2015)

In both countries popular sentiment against coal emissions and continuously falling prices of wind and solar power have turned around further expansion of coal power plants.

In 3.1.3.2 it is noted that, “Delivered prices to Japan in the range of $3.0/MMBtu suggest that Powder River Basin coal would have a difficult time being cost-competitive, if shipped through the Pacific Northwest to Japan or other Pacific Basin countries, until international coal prices increase.” So the financial viability of this project hinges on whether international coal prices will significantly increase, but there is no stated rationale for such an increase. Table 12 forecasts coal prices doubling through 2040. Table 13 predicts 2016 natural gas prices more than twice as high as actuals, and not related to recent trends. Table 14 predicts China demand increasing at 1.67% CAGR, and India at 2.24% CAGR, through 2038. For all the detail and complexity of this IPM model, it wasn’t anywhere close to predicting the massive US coal bankruptcies of the past year.

Due to wrong data inputs, most of sections 4, 5, 6, and 7 in the SEPA Coal Market Assessment Technical Report are grossly in error. The entire report must be redone for the EIS**,** using updated actual demand and prices, and more realistic assumptions about future demand, especially in light of continued low natural gas prices worldwide and continuously decreasing costs of wind and solar electricity.

The DEIS is deficient in not analyzing how such a terminal could possibly be part of a profitable coal export business model by 2024, or ever. The EIS must include potential environmental impacts of a poor or marginal business model, such as:

1) Inability of the terminal owners to afford the insurance, internal inspections, safeguards, personnel training, or updated equipment necessary to ensure proper operation for minimal environmental effects.

2) Insufficient financial reserves to pay for spill remediation, plant or equipment upgrades, or site cleanup when the terminal closes.

This project has already proven to be uneconomic. It’s a zombie, perpetuated by a bottom-feeding financial entity that simply hopes to sell it to the next bigger fool. All the coal companies that might use this terminal have gone bankrupt, and none of them are willing to sign up for it.

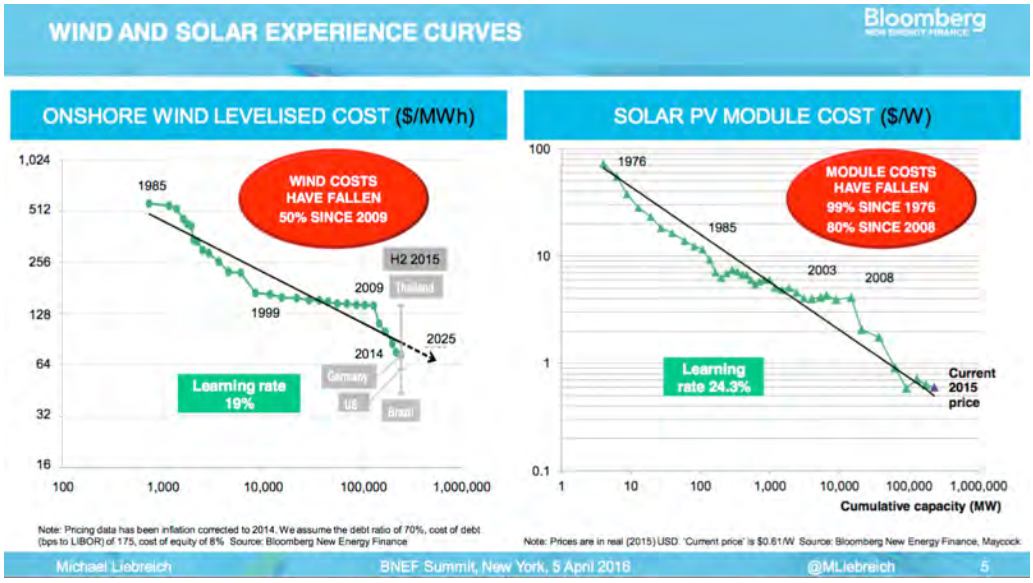
Worldwide coal demand is shrinking, particularly with China shuttering coal plants now and installing solar and wind power. Thermal coal prices continue to slide since their peak in 2011:



Four years ago Deutsche Bank presciently noted that “Coal is a dead man walking.” At that time the business model was deteriorating, nobody would insure a coal project, and carbon capture and sequestration was clearly destined to be a loser because the economics don’t work, even if the hardware might. The coal death spiral has continued, until now all the largest US coal companies are bankrupt and there is a $2.7B coal cleanup bill[2] that taxpayers may end up paying. In March the US used 33% less coal than last year[3]. Natural gas prices have caused many of the coal plant closures:



And the impressive cost trajectories of wind and solar power further guarantee coal’s obsolescence[4]

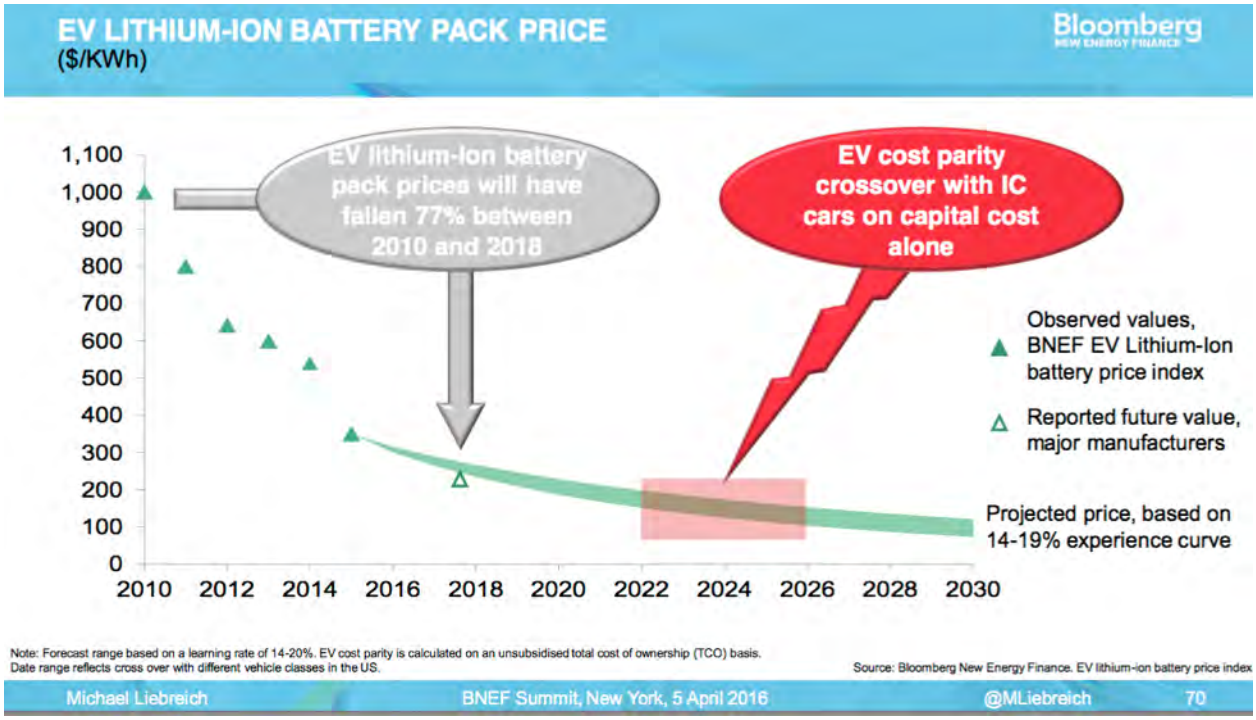


[2] cleanup costs http://thinkprogress.org/climate/2015/06/08/3667061/coal-cleanup-insurance/
[3] 33% less http://www.utilitydive.com/news/eia-coal-generation-drops-222-in-march/420107/
[4] Global coal markets http://about.bnef.com/video/liebreich-state-industry-keynote-bnef-global-summit-2016/

BNEF notes that the combined effect of more affordable wind, solar, and natural gas energy, plus nascent storage technologies, is that we are awash in power generation, although still short of enough storage options. In this mix coal is the least desirable, due to its high emissions of greenhouse gases (GHGs) and toxics, high water usage, and the superior startup/shutdown ability of gas peaker plants.

This project is expected to be operational in 2024. By that time the International Technology Roadmap for Photovoltaics (ITRPV) conservatively estimates that PV modules will cost half what they did in 2013.[5] Wind power continues to get cheaper and more consistent as hub heights increase[6]. And lithium-ion batteries will be about half their current cost by 2024 as electric vehicles ramp up[4].

[5] http://www.itrpv.net/Reports/Downloads/
[6] http://energy.gov/eere/wind/wind-vision

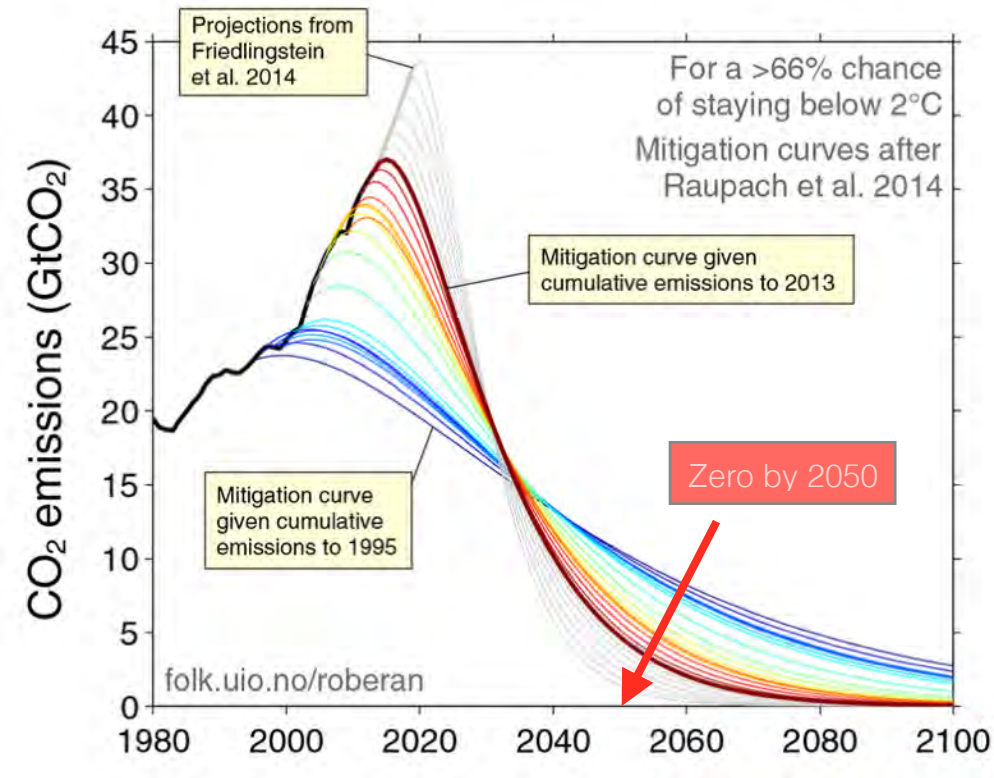


The EIS must justify why Longview should dedicate prime industrial real estate to such a clear loser project.

GHG Emissions (SEPA Coal Market Assessment Technical Report)

Due to the gross inaccuracies of the modeling in this report, the GHG emissions are also unusable and must be redone.

The global requirement to rapidly cut GHG emissions will render coal increasingly unsuitable and more expensive in the coming years. This chart from the IPCC illustrates the urgency with which emissions must be cut to achieve a 66% chance of holding global warming to 2C:



At what point will the EIS become obsolete because the business or environmental landscape has changed so much that the EIS findings are no longer accurate? For example, fees on greenhouse gas (GHG) emissions are increasing and being applied in more countries, particularly China.

S.7.1 Social and Community Resources

A. Solar resource

The DEIS is deficient in not addressing the loss of solar resource as a significant community resource. The DEIS should note that the large area used by the project (190 acres) could be utilized for solar power generation as a dedicated solar farm or with solar arrays atop large warehouses or other buildings.

A comparable utility-scale solar generation facility is the Baldock Rest Area on 7 acres on I-5 near Wilsonville, which generates 1.75 MW of power. http://www.solarworld-usa.com/newsroom/news-releases/news/2012/advanced-transportation-energy-systems

190 acres in Longview is enough space for a 47 MW ground-mount solar installation. 47 MW could entirely power about 3100 homes plus two electric vehicles per home (15 kW per home). That's roughly 20% of the homes in Longview/Kelso. Such facilities are very financially efficient and will be increasingly attractive as solar technologies get cheaper.

Instead of offering a best case of 135 jobs, 10,000 residents would be better off with free energy to entirely and cleanly power their houses and cars. At 8.3 cents/kWh and gasoline at $2.50 per gallon, the average Longview household (assume two electric cars) would save about $900 for electricity and $2500 in gasoline annually; and 3100 households would save over $10 million a year, which is 50% more than the average income of 135 Americans.

Rail tracks, a huge pile of coal, and coal dust everywhere don't allow space for solar energy collection. (Roof space would not be as space-efficient as a ground-mounted array, so perhaps half of the 47 MW would be available if panels are mounted on warehouses.)

B. Land resource

For the third Project Objective, the DEIS is deficient in not pointing out the extremely poor use of the land area for creating jobs. The project would generate less than one job per acre of land used. Any small-business park creates at least 30 jobs per acre, including parking.

Volume III.c
2.3 Reduce Local Unemployment

I'm a retired high-tech CEO. I cofounded, and for decades led, an Oregon company (Cascade Microtech, Inc.) which now employs over 500 people and is still growing, so I feel qualified to opine on creating jobs. I didn't need pollution subsidies or environmental waivers to create jobs —what I needed was talented people, and talented people don't want to be anywhere near coal chutes or coal piles. A huge pile of coal is one of the least attractive features a town can have.

Instead of creating a Superfund site, Longview would enable more jobs by adopting policies that attract more people to live in Longview. People now seek clean, walkable neighborhoods with recreation options close by. Like a pedestrian/bicycle path on the waterfront, next to a solar farm. Portland would love to get back the waterfront on the east side of the Willamette, but now moving everything is prohibitively expensive.

The DEIS is deficient in not estimating the loss of jobs and property values along a coal chute through the Columbia Gorge National Scenic Area. How many talented people would decide that they'd rather live somewhere with clean waterfronts, far from coal trains? How much would property values decline as a result of noise, coal dust, waiting for 16 more trains every day at at-grade crossings, etc.? What would be the environmental and cultural impacts of a coal train derailing and dumping coal into the Columbia?

The DEIS is deficient in not analyzing how many people MBTL expects to hire from the existing Longview workforce. The current progress of artificial intelligence and robotics will obviate jobs like vehicle drivers and any job that is repetitive or dangerous. So is the estimate of 135 operating employees realistic? BNSF runs a train with two people, and coal plants unload coal cars with one person per shift. The only jobs not automated at the terminal would be for managers and automation experts—how many of those currently live in Longview? How many jobs would actually be created?

This is not a complete review.

This compendium is only comments from briefly browsing portions of the DEIS. The inaccuracies and incompleteness are frankly disappointing and shocking. How is a reader supposed to trust this data through 2038 when it is grossly in error for 2016? The revisions necessary are so extensive that it warrants a further DEIS cycle of reviews. And this EIS is a waste of everyone's time unless there are funding entities signed up to build the project, instead of running away from it.

Thank you for this opportunity to voice my inputs.
Eric Strid

Submission Number: ***MBTL-SEPA-DEIS-0002929***

Received: 6/13/2016 3:18:05 PM
Commenter: Julius Strid
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001306***

Received: 5/26/2016 6:54:06 PM
Commenter: Erik Strom
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I worked in Centralia Washington and I am very familiar with the Longview port area. I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. Too often, projects that promise historic economic opportunity like Millennium Bulk Terminal get lost in cumbersome procedures and bureaucratic delays. This is unacceptable. Our communities need to foster economic growth when it comes knocking on our door. This project has the ability to deliver this, and has earned a fair and detailed draft EIS after five long years.

Submission Number: ***MBTL-SEPA-DEIS-0002219***

Received: 6/7/2016 7:32:23 PM
Commenter: Blair Strong
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It is time to support the draft study as it relates to the port at Longview. We need the economic boost this port will provide and the world needs American coal. This draft EIS is exhaustive; there is nothing further to study. Coal is an abundant commodity that moves freely in a global market. Asian economies consumed over 5 billion tons of coal in 2012 without any exports through Washington ports. Additional supplies to feed that market are coming on line from Australia, Indonesia, South America and Mongolia, and domestic supplies in China are becoming more readily available. Assuming that incrementally new GHG releases will result from some portion, or all, of future coal exports from a new terminal in Longview Washington that, at maximum capacity, would amount to less than 1% of Asian coal use, requires a degree of speculation that is not permissible under SEPA or NEPA. The State of Washington should not obstruct commerce that originates in the other states of Washington and Wyoming. Additionally, Powder River coal may have fewer adverse environmental consequences than types of less efficient and dirtier types of coal often used in China. Thank you for your consideration. I look forward to seeing this project come to reality.

Submission Number: ***MBTL-SEPA-DEIS-0001314***

Received: 5/26/2016 6:58:09 PM
Commenter: Shawn Strugeon
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. Media coverage would have us believe that transporting coal by rail through our state is unprecedented it's not. We've transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage? If people insist we can do better

Submission Number: ***MBTL-SEPA-DEIS-0000614***

Received: 5/19/2016 7:29:10 PM
Commenter: John Stuart
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it’s time to move forward. The draft EIS to evaluate Millennium Bulk Terminals proposed Longview project should be kept within reason. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with the process in a timely manner. It's the fair thing to do.

Submission Number: ***MBTL-SEPA-DEIS-0002082***

Received: 6/7/2016 4:48:11 PM
Commenter: Troy Stuart
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Millennium Bulk Terminals has proposed a coal export terminal at Longview that is both environmentally-sound and economically beneficial. I ask that you approve this project and the environmental study without delay. Cowlitz County has a surplus of industrial sites which impedes the development of the Reynolds Smelter site (due to cost of remediating and redeveloping a brownfield site). Millennium is taking on the redevelopment and can turn around a dilapidated, underutilized site. Grant the project its permits. I appreciate you considering this feedback.

Submission Number: ***MBTL-SEPA-DEIS-0000597***

Received: 5/19/2016 6:51:42 PM
Commenter: Gary Stubblefield
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

There's no time like the present to support the draft study as it relates to the port at Longview. We need the economic boost this port will provide and the world needs American coal. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it’s time to move forward. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0001520***

Received: 5/31/2016 4:43:47 PM
Commenter: Alan Stuber
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Longview is a town built on natural resources and import/export. I believe this project is a perfect fit for our community. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn't like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002974***

Received: 6/13/2016 3:45:36 PM
Commenter: Bob Stuhlmiller
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0000503***

Received: 5/19/2016 5:05:44 PM
Commenter: Rhonda Stump
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Moving this project forward is important to me, my family and my community. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0002390***

Received: 6/9/2016 6:06:47 PM
Commenter: Billy Sturgell
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Millennium Bulk Terminals has proposed a coal export terminal at Longview that is both environmentally-sound and economically beneficial. I ask that you approve this project and the environmental study without delay. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it’s time Longview went back to work. Thank you for accepting comments for this important project. Please make the necessary steps to move forward on its approval as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001319***

Received: 5/26/2016 7:00:11 PM
Commenter: Marilyn Sturgeon
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. In Longview, 56% of kids need free and reduced price lunch at schools and go home to neighborhoods facing 8% unemployment. We cannot afford to look the other way when projects in this area guarantee new jobs and private investment in our schools, roads, and local services. In fact, the estimated number of jobs related to construction activity at the Millennium Bulk Terminals project is 1,350 temporary direct jobs - that will mean $70 million in direct wages! When the project is completed there will be about 135 direct jobs and about 165 indirect jobs. These numbers simply cannot be ignored. Remember this project's economic benefits to the local community. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001392***

Received: 5/26/2016 7:40:09 PM
Commenter: John Sturtz
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water â€" coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! Our region is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal will help our recovery. Thank you for beginning the scoping process.

Submission Number: ***MBTL-SEPA-DEIS-0001678***

Received: 5/31/2016 6:39:00 PM
Commenter: John sturtz
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly support the project and the thousands of jobs this project will create. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn't have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. This is an old industrial property being redeveloped. Keep the review to what is normal and factual.

Submission Number: ***MBTL-SEPA-DEIS-0000818***

Received: 5/24/2016 11:07:36 AM
Commenter: Renee Such
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I support no action on the coal plant. We need to keep fossil fuels in the ground. Think of your children and grandchildren--what kind of future do you want for them? The other day temperatures in India reached 124 degrees for the first time. That could happen here, too, if we keep using fossil fuels. The coal depot near Longview would also degrade that particular area and spread coal dust, noise and property devaluation throughout the area. Thank you for reading this.

Submission Number: ***MBTL-SEPA-DEIS-0001102***

Received: 5/24/2016 7:23:14 PM
Commenter: Fawn Suhr
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied â€" get on with it already. The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002115***

Received: 6/7/2016 5:10:43 PM
Commenter: Don Sullivan
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our state is trade dependent and a critical part of the import/export infrastructure of the West coast. International trade is essential to the economy of Washington and supports many family-wage jobs. In Longview, 56% of kids need free and reduced price lunch at schools and go home to neighborhoods facing 8% unemployment. We cannot afford to look the other way when projects in this area guarantee new jobs and private investment in our schools, roads, and local services. In fact, the estimated number of jobs related to construction activity at the Millennium Bulk Terminals project is 1,350 temporary direct jobs - that will mean $70 million in direct wages! When the project is completed there will be about 135 direct jobs and about 165 indirect jobs. These numbers simply cannot be ignored. Remember this project's economic benefits to the local community. I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Submission Number: ***MBTL-SEPA-DEIS-0002777***

Received: 6/13/2016 2:17:52 PM
Commenter: Todd Sullivan
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003010***

Received: 6/13/2016 4:33:57 PM
Commenter: Todd Sullivan
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0002207***

Received: 6/7/2016 7:20:52 PM
Commenter: Paul Sunde
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough, now it is time to move forward with a fair process for permitting. I greatly appreciate you considering my input.

Submission Number: ***MBTL-SEPA-DEIS-0001056***

Received: 5/24/2016 6:42:35 PM
Commenter: Edward Sunseri
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium’s proposal is unprecedented and has far reaching economic implications. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0001185***

Received: 5/25/2016 8:58:53 PM
Commenter: Susan Sunshine
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Fellow Humans Who Will Read This, The Millennium coal terminal proposed for Longview reminds me of "B" movie plot where the lashing tail of a dying giant dinosaur destroys some edifice housing its pursuers. That coal is a dying industry is confirmed regularly as coal companies small and large collapse. Its desperate death throws include the Longview terminal. We humans, like the salmon, are on course to becoming an endangered species and, unlike the salmon, we are doing it to ourselves. Just because we can imagine and plan a project should not necessarily mean we should undertake that project. We must set limits to how far we will go in jeopardizing our future. Continuing the mining, transportation, and especially the burning of coal is no longer reasonable, ethical, or moral on a planet whose life forms are rapidly being destroyed by just such activity. We have an opportunity right now, right here in SW Washington to say NO and say NO we must if we are on the side of life not greed. Thank you for the work you have done to analyze potential impacts from the Millennium Bulk Terminal. I hope the plain facts you present and the determined opposition of many, many Washingtonians are enough to insure the denial of a permit.

Comments on the Noise Impact of the Proposed Millennium Bulk Terminals Longview, Washington

Alice H. Suter, Ph.D.

June 13, 2016

My name is Dr. Alice Suter. I am a retired audiologist living at 1106 NE Tillamook St., Portland, Oregon, 97212. My specialty for many years has been the effects of noise on people. I have worked as a Senior Scientist at the U.S. Environmental Protection Agency's (EPA) Office of Noise Abatement and Control, and as Manager of the Noise Standard at the Occupational Safety and Health Administration in the U.S. Department of Labor. Later I was a Visiting Scientist and Research Audiologist at the National Institute for Occupational Safety and Health in the Department of Health and Human Services. I have also worked for many years as an environmental and occupational noise consultant, advising companies, municipalities, and government agencies about their noise problems. My complete resume is available on request.

I have reviewed Chapter 5, the sections concerning the noise impact of the Draft SEPA Environmental Impact Statement (EIS) for the proposed Millennium Bulk Terminals at Longview, Washington. It is my opinion that the noise impact on the nearby community would be extremely serious, considerably more serious than the draft EIS concludes.

On page 5.5-25, the draft EIS estimates that the noise impacts from trains on some 229 residences would be moderate and on 60 homes would be severe. First, the method by which the noise impacts are estimated is incomplete and biased away from the public health and welfare impact. One should also keep in mind that the number of people impacted would considerably exceed the number of homes. Most importantly, on examining the noise map in Figure 5.5-7c and comparing it to the existing noise contours in figure 5.5-5c, it is clear that large portions of the city would be adversely impacted, greatly exceeding the estimates made in the draft EIS. I will explain the reasons for my opinion in the paragraphs to follow.

1. Use of Energy Averages

The criteria to measure the impact of noise on the citizens of the surrounding community has been expressed by the company's consultant as $L_{dn,}$ for which the current terminology is Day-Night Sound Level (abbreviated DNL). The DNL is a cumulative level that averages sound levels over a 24-hour period, using a 10 dB penalty for nighttime noise. Its best use is to compare the impact of different noise scenarios and noise reduction methods with one another.

Although the DNL is commonly used to assess the impact of various noise sources, particularly aircraft noise, it has been widely criticized for several decades. A more conservative metric is widely used in Europe - the DENL, which provides an additional penalty for the evening hours between 5:00 and 8:00 pm, a time period that is important for rest and relaxation.

The principle criticism of DNL is that it does not give adequate importance to single or discrete events. Studies have shown that DNL accounts for only a limited amount of the variance between noise sources and their impact on exposed communities. Even the Federal Aviation Administration (FAA), a long-time supporter of DNL, has recommended supplementing the DNL with other metrics to assist the public's understanding of the noise impact (FAA, 2006). Other metrics described in a recent report by the National Academy of Engineering (NAE) include the L_{Amax}, the A-weighted sound exposure level (ASEL), and metrics that give the number of loud events occurring above an average, such as the ASEL (NAE, 2010).

In this draft EIS, averaging noise levels fails to take into account the effect of individual events, with locomotive horns and train pass-bys being perfect examples. The effects of these events should be assessed by one of the metrics recommended by the FAA or NAE in the paragraph above to better understand the full impact. Although it is convenient to express criteria in terms of averages, people do not experience noise as averages — they experience noise as events.

2. Use of DNL for Transportation Planning

Anyone making policy decisions on the basis of this kind of EIS must bear in mind that the missions of agencies such as the Federal Transit Administration (FTA)

and the Federal Railroad Administration (FRA) are to foster the use and health of the transportation industry, and their impact statements necessarily reflect that bias. These agencies are not public health agencies like the EPA and the Department of Health and Human Services (DHHS). The “community impact” that they measure is not in health but in behavior in terms of community reaction.

The FTA report from which the models in this EIS are derived grades community reaction according to the excess of a new noise level above the pre-exiting noise level. It describes this process as proceeding from “no reaction, although noise is generally noticeable” to “sporadic complaints” at a few decibels above the pre-existing level, through “widespread complaints or single threat of legal action” at 5-10 dB above pre-existing level, to “several threats of legal action or strong appeals to local officials to stop noise” at 10 to 15 dB above the pre-existing level (FTA, 2006, p. 2-14). The report also makes the caveat that although their criteria have been documented in scientific literature, they “do not account for specific attitudinal factors which may exist.” These types of community responses are then related to DNL as a function of the percentage of people “highly annoyed” by noise.

2. Noise Impact Criteria

Probably the most important argument against current usage of DNL criteria is that this metric is based on community surveys showing only the percentage of people describing themselves as “highly annoyed” by noise, as in the categories listed on page 5.5-10. This criterion assumes that people who are *somewhat* annoyed are not to be counted, but adverse reactions, including the psychological and physiological effects of noise may occur considerably before the point at which individuals describe themselves as “highly annoyed.” In all probability, the reason why this criterion is often used is because the “highly annoyed” residents are the ones most likely to complain and initiate lawsuits, even though the others are still adversely affected.

In my opinion, the FTA/FRA guidance, shown in Figure 5.5-4 does not adequately describe community response. While it is true that people who are already exposed to high levels of noise in their environment are expected to tolerate smaller increases in noise, in part because of the logarithmic nature of the decibel, it is also true that com-

munities accustomed to a relatively peaceful and quiet environment may be seriously impacted by changes in their environment, which the FTA's report acknowledges (FTA, 2006, Fig. 2-14). These are communities that vigorously oppose the citing of racetracks or new or expanded airports in their established communities, actions that may have occurred despite community opposition. On page 5.5-27, the draft EIS alludes to this point by stating that in areas where existing noise levels are low, "there is a greater likelihood that increased train traffic would result in more noticeable noise...." on BNSF main line routes.

Citizens who are either fearful or have a negative impression of the new noise source may be much more disturbed than the planners anticipate, as in the "specific attitudinal factors" cited in the FTA report mentioned above (FTA, 2006). This is quite likely to happen in a community where individuals feel threatened by the health and safety impacts of daily exposure to hazardous materials as miles of uncovered coal cars run through their community.

3. <u>The Human Element</u>

It has always been clear that there is a great deal of scatter in the data points comprising the "noise annoyance" criteria, decreasing the predictive power of these kinds of impact statements. But also, the reactions of community members to noise should not be viewed merely as data points but as psychological and physiological effects on individual residents. These are humans, not just houses.

Throughout this draft EIS, the human element is played down. On page 5.5-10, the draft EIS defines **no impact** as a "change in noise level that would result in an insignificant increase in the number of instances where people are highly annoyed by new noise." Here again this criterion ignores all the people who are disturbed, but not categorized as "highly annoyed." The definition of **moderate impact** as a change in the noise level that would be noticeable to most people "but may not be enough to cause strong adverse community reactions" provides a window into the motivation of those who commission these kinds of impact statements. In other words, you can cause distress to a community up to a point, but "adverse community reactions" (i.e. lawsuits) should be avoided. **Severe impact**, causing a significant percentage of the people to

be highly annoyed by noise, is acknowledged to produce adverse community reaction. By admitting that the residents of at least 60 homes would experience a severe impact, the draft EIS is opening the door to concerted community reaction. Too often this reaction is directed toward local officials rather than the original noise source, since the noise source has already been approved.

However, the estimates of 60 severly-impacted or 229 moderately-impacted homes reflect the tip of the iceberg because both of these noise impacts have been grossly underestimated.

4. Noise Contours

Despite its reliance on the FTA's projected noise impact guidelines in Fig. 5.5-4, Millennium's consultant has also drawn noise contours reflecting the "before" and "after" scenarios resulting from the increase of 16 coal trains per day. These contours include DNLs from 55 dB to 75 dB in 5-dB increments. Interestingly, Figure 5.5-8, which shows the areas severely and moderately impacted by noise have omitted these contours. However, by comparing Figures 5.5-5c and 5.5-7c, it is obvious that all of these contours have shifted significantly in the proposed noise conditions. The importance of this shift cannot be overstated. The 55 DNL contour, which currently includes only a small section in the southern part of the City, is proposed to include a large swath of residential area extending along 32nd Avenue and Alabama St., up to and north of Beech St., nearly as far as Tennant Way. The draft EIS makes no mention of the number of houses included in this contour, but there must be several hundred or more, with residents numbering into the thousands.

A DNL of 55 dB has been identified by the U.S. Environmental Protection Agency as the level requisite to protect the public health and welfare from the harmful effects of noise (EPA, 1974). This is the noise level that *should* be used to assess the impact of noise on communities. Every resident south of this contour as far as the area of the tracks would be living in a noise level exceeding the EPA's identified safe level.

As the noise contours proceed toward the source from DNLs of 55 to 60 and 65 dB, the effects of noise will be increasingly serious. It appears that the area categorized

in the draft EIS as severely impacted will be subject to DNLs of 70 dB or greater, as if they were living under the flight path of an airport.

The FTA/FRA method of analysis clearly ignores the whole concept of public health and welfare, basing its method instead on the likelihood of citizens being angry enough to sue.

4. Health and Psychological Impact

People living in areas above the 55 dB DNL will be interrupted in their enjoyment of conversation and TV, they will be awakened at night, and their stress levels will be increased. They will be more susceptible to cardiovascular disorders and other stress related illnesses.

It is well known that noise can disturb sleep patterns even without awakening, and sleep quality is important to one's mental and physical health. The World Health Organization has put forward recommendations for nighttime noise levels outside sleeping quarters, in other words before the attenuation of windows is considered (WHO, 2009). Average levels less than 30 dBA should prevent any effects. Between 30-40 dBA some disturbances will occur, between 40-55 dBA adverse effects will occur with many individuals, and above 55 dBA, a sizable proportion of the population will be highly annoyed, their sleep will be disturbed, and the risk of cardiovascular disease increases. The WHO recommended noise levels are considerably below the levels identified as "moderate" or "sever" in the draft EIS, either by its FTA method or simply using the noise contours.

There is an extensive literature on the various extra-auditory (non-hearing loss) effects of noise on individuals and communities, including sleep disruption, communication and activity interference, and the psychological, physiological, and performance effects. These studies are too numerous to mention here, but references could be made available upon request.

5. Potential Mitigation

There are several areas within the mitigation discussion that are vague or undetermined.

First, there is no assurance that rail noise mitigation would occur. It is clear that the burden of application for Quiet Zone approval rests with the community. Although the company has pledged assistance in the preparation of the application, there is no guarantee that the application would be approved. While the draft EIS states that the "Applicant [Millennium] will fund all improvements," the company's website states only that the Industrial Way and Oregon Way crossings will be funded. Who will fund the other 6 at-grade crossings? What will be the noise impact of making these changes and leaving the others unimproved? Such promises of funding should not be considered a guarantee, especially in view of the condition of the coal extraction industry in today's economic environment.

On page 5.5-30, the draft EIS states that "it is not known at this time whether terminal design would prevent noise levels from exceeding the applicable standard at all noise-sensitive receptors." Given the fact that the number of "noise-sensitive receptors" is grossly underestimated, this statement becomes even more vague.

6. Not Included in the Analysis

The draft EIS makes no mention of the adverse physiological and psychological effects of noise on the exposed community, even for those residents considered severely or moderately impacted. It is impossible to accurately assess the community impact without the prediction of these effects.

Neither is there any mention of the effects of noise from the construction project on the workers themselves, who will be exposed to various sources, such as compressors, pneumatic tools, and train sources. Will Millennium have a hearing conservation program? Will that program meet the requirements of Washington's state plan for OSHA? Will the railroad workers be provided with sufficient protection from the extensive durations of high-level noise emitted by the horn?

Summary

On several counts this draft Environmental Impact Statement is inadequate to predict the impact of noise on the citizens of Longview should the Millennium Bulk Terminals project be approved. The FTA/FRA method of analysis is much too permissive

and is not consistent with the true impact on the health and welfare of the citizens of Longview. This analysis clearly shows that the concerns of the FTA and the FRA are to foster the health of the transportation industry rather than the health of the public. The practice of using noise averages without supplementing them with some kind of single event descriptor confuses the public and underestimates the impact. Stating the impact only in terms of percentage of the community predicted to be “highly annoyed” leaves out all of those who experience aversion to the noise but do not express themselves by vigorous community reaction or lawsuits. By failing to apply the noise contours to the analysis, particularly the contour of the EPA’s identified DNL of 55 dB, the draft EIS leaves out a large swath of the city and its residents who are expected to be impacted. The analysis makes no mention of the most important noise impacts, which are those causing psychological and physiological effects. Finally, questions around financing noise mitigation are unresolved. In the end, it is the City of Longview and its citizens that would bear the health and financial burdens, and most likely the complaints and law-suits resulting from this extremely noisy proposal.

A revised version of the EIS, if prepared properly, would only show these adverse effects to be even more serious.

References

EPA (1974). Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare With an Adequate Margin of Safety. U.S. Environmental Protection Agency, Washington, DC.

FAA (2006). Order 1050.1E, Chg 1. Section 14.5, Supplemental Noise Analysis. U.S. Department of Transportation, Federal Aviation Administration, National Policy. Washington, DC.

FTA (2006). Federal Transit Administration. Transit Noise and Vibration Impact Assessment. Report #299600 by C.E. Hanson, D.A. Towers, and L.D. Meister, Harris Miller Miller & Hanson, Inc. Available from the National Technical Information Service, Springfield, VA.

NAE (2010). *Technology for a Quieter America*. National Academy of Engineering. National Academies Press, Washington, DC.

WHO (2009). Night Noise Guidelines for Europe. World Health Organization, Copenhagen, DK.

Submission Number: ***MBTL-SEPA-DEIS-0002147***

Received: 6/7/2016 6:35:20 PM
Commenter: Kory Sutherland
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Here are my comments on the Millennium coal export terminal: This project is a joke, combining wealthy executives who do not care for their employees with greed for profits produced by natural minerals. Meanwhile, the plants that burn these minerals â€" coal, to be exact â€" are operated with little to no care for the environment they are destroying. All of this is done under the guise of job creation, when in truth, the motivation is entirely "This is my time, I must take what I can while I can, and care not for the future." The people behind this very campaign, and this industry, must be taxed heavily, to the greatest extent allowed by law, and perhaps more, so that when the time comes that future generations must deal with the problems they have caused, funds are available to do so. Do not be deceived by the righteous self-importance of those who operate the coal industry: They will take until there is nothing to give back, and then do nothing to ensure the well being of those whose backs they stand upon, nor that of those who must bear the consequences of their actions tomorrow. Please, put an end to this raping of lands, people, and future not at your soonest available convenience, but before it is too late to do so.

Submission Number: ***MBTL-SEPA-DEIS-0001592***

Received: 5/31/2016 5:30:58 PM
Commenter: Mike Sutherland
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I've been following this issue, and am glad to have the chance to weigh in. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. I applaud the agencies work on this permit process. The results will provide a more-than thorough "hard look" at the possible impacts of the Millennium Project in Longview which is needed to keep things moving ahead. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001276***

Received: 5/26/2016 6:34:26 PM
Commenter: Tammy Sutherland
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it’s time Longview went back to work. Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Submission Number: ***MBTL-SEPA-DEIS-0000245***

Received: 5/10/2016 5:49:42 PM
Commenter: Joshua Sutinen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Moving this project forward is important to me, my family and my community. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn't like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. Thank you for your work to move forward with this project.

Submission Number: ***TRANS-PASCO-M1-00045***

Received: 6/2/2016 12:00:00 AM
Commenter: Lori Sutriotra
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you. My name is Lori Sutriotra (phonetic), don't worry about it. I spelled it on the ticket, and I live in Walla Walla.

I originally -- if you get me talking about it long enough, you will hear my southern twang. I grew up in Peabody coal country and I also lived in Minnesota. And what I would highly recommend that folks do is not just take what is happening here, but look to see what the coal industry has been doing over the decades. And it's not anything clean or environmental about coal. There's nothing sustainable about coal. And there's a lot of problems that people don't necessarily think about at first. There's coal dust. There's the things that I've been hearing all afternoon being brought up.

But some of the specific things like the train traffic that was brought up, think about it again. Now, when the Draft EIS was made up, I hear that there was about five billion tons that were going to be. Now it's 50 billion. That's a ten-fold increase in the amount of traffic. We've got 16 trains daily now being added to the traffic. And what does that mean? Does it mean you're going to be late for ballet practice? Well, yeah. So you know that may be something that some people might find an inconvenience. But what we found, same things, 16 trains in Minnesota when I lived in Minnesota, we could not get them to guarantee access to health. They couldn't do it. We couldn't get them to say if we got all these coal trains we couldn't get the emergency services. And that was something that shut that project down. So please --

EVENT HOST: Thank you. Next speaker. Two minutes.

Submission Number: ***MBTL-SEPA-DEIS-0000136***

Received: 5/9/2016 12:54:41 PM
Commenter: Norman Sve
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. Current world markets and decision in East Asia capital allocation over the last decade demonstrate that American coal exports are not necessary to, nor causally-related to, decisions in China, Korea or Japan to build coal-fueled power generation capacity. The environmental impacts will occur regardless of Cowlitz County and Ecology decisions to grant permits for construction of the project-specific docks and terminals in question. I appreciate you considering this feedback.

Submission Number: ***MBTL-SEPA-DEIS-0002356***

Received: 6/9/2016 5:42:43 PM
Commenter: Lois Svrko
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! I’ll look forward to updates.

Submission Number: ***TRANS-LV-M1-00020***

Received: 5/24/2016 12:00:00 AM
Commenter: Jacob Swan
Organization: Looit-Way Brewery
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

SPEAKER 16: Hello. My name is Jacob Swan. I'm the brewery manager at Looit-Way Brewery in downtown Vancouver. I'm here speaking on behalf of myself as well as the owners Thomas Poffenroth and Devon Bray. I would like to thank you for the opportunity, and also thank all of you for taking the time out of your day to address this important matter and let voices be heard. I'd like to start by saying we're about a block away from the railroad tracks right in downtown Vancouver, which is a burgeoning city. We have lots of good projects going on, a lot of good economic benefit that is being threatened by more than one project of this matter. Knowing that I spend most of my days at the brewery, I see how congested the rail lines are there. I can't imagine what 16 more mile-plus long trains would do to that effect. Which brings me to, the rail infrastructure is well documented that it is not able to handle the increased capacity, who's going to pay for that? That is something that really needs to be addressed. Two minutes is not enough. So, moving on, we feel that there are certain aspects that are not addressed well enough in the EIS. Unregulated burning of coal across the seas, where its final destination is, railroad crossings, how are we going to mitigate the delays of railroad crossings for ambulance and emergency responders. The coal dust thing. I don't believe that it has been disproved. It has been well documented that the topping agents over time and over distance do not do an adequate job. There is coal on the railroads, there is dust, there is health risks. That needs to be mitigated. Moving on, the industry needs to move on. It's a dying industry. Sure, it looks like it's going to be bumped now that they're not using nuclear power, but that is not true there. There are better reasonable alternatives. The health risks, the environmental risks, just all of the issues that have not been mitigated, even down to the Columbia River Bar being one of the most dangerous crossings in the world. If there's an accident it's not worth the small jobs that will be gained. The environment is never second to jobs. EVENT HOST: Thank you. Next speaker. I'd just please remind the audience of the ground rules, and we'll have signs only. No audible identification with the speaker's position. Thank you.

Submission Number: ***TRANS-SPOKANE-M2-00016***

Received: 5/26/2016 12:00:00 AM
Commenter: Twila Swan
Organization: Spokane Tribe
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Twila Abrahamson Swan. I'm the Spokane Tribal Air Quality Program Manager, the Spokane Tribe that once lived upon protected and respected over three million acres of land in this region.

Throughout history, the Spokane tribal community has withstood the continuous assault by individuals and groups who sought exploitation and degradation of our environment and culture.

Through litigation and negotiation the Spokane Tribe has and will continue to protect and preserve the living cycle of the Spokane people. This proposal threatens to set back historic and current efforts by the Spokane Tribe to protect and restore our air and water quality and habitat along the Spokane and Columbia Rivers.

Tribal lands and resources all along the transportation route are facing increased rail traffic that adds to existing pollution, toxicity concerns, and also threatens the immediate safety of our communities.

One major cultural resource that is not being addressed in the EIS is the Petra Cliffs along the Columbia River Basin.

This facility, if permitted, will directly negatively intrude on downstream tribes' exercise of their treaty fishing rights, which are the supreme law of the land under Article 4 of the U.S. Constitution.

Upriver tribes and communities above the major hydropower damns on the Columbia River are preparing and entering negotiations with the United States and Canada regarding the Columbia River Treaty.

We are asking that ecological health of the river be included into the treaty and we're preparing our rivers for the return of salmon, we're preparing our people, and we're preparing our children for their return.

The Spokane Tribe stands today in protection of the waters and resources we depend on, and also to develop a more sustainable and responsible approach to meeting our present and future energy needs, that analysis and findings are significant, and environmental impacts that cannot be mitigated should be used to reject this massive shipping terminal.

Submission Number: ***MBTL-SEPA-DEIS-0003252***

Received: 6/13/2016 7:13:00 PM
Commenter: Samantha Swanberg
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000067***

Received: 5/3/2016 4:04:47 PM
Commenter: Stephanie Swanberg
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003365***

Received: 6/13/2016 10:54:45 PM
Commenter: Art Swannack
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

As a county commissioner I see a real need for modern export facilities which help keep our economy growing. This facility is needed. I also believe the environmental impact assessments must be focused on local effects. Overseas potential effects are not within our baliwick and we don't want countries overseas stopping our businesses with any absurd rules they might dream up as retribution for our inaction or improper action related to this terminal. Please approve the permits. It's been long enough.

Submission Number: ***MBTL-SEPA-DEIS-0001018***

Received: 5/24/2016 6:08:51 PM
Commenter: Jennie Swanson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to state my opinions on this important issue. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it's time to move forward. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0000591***

Received: 5/19/2016 6:35:00 PM
Commenter: Thomas Swaykus
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Let's get moving on the Longview coal export terminal! This project has been on hold for four years awaiting permits. These environmental studies need to get moving. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview's quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0002834***

Received: 6/13/2016 2:41:23 PM
Commenter: John Sweeney
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental review is being used as a political device to halt industrial usage. These industrial usages are the bone and sinews of our economy. Don't let this be defeated. This has happened in my town of Everett, where a solid industrial port is being turned into an unproductive -- and so far unsuccessful -- residential/retail site.

Sweeney, Jordan (0460)

Submission Number: ***MBTL-SEPA-DEIS-0000460***

Received: 5/17/2016 7:30:18 PM
Commenter: Jordan Sweeney
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to state my opinions on this important issue. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001930***

Received: 6/5/2016 7:41:01 PM
Commenter: Judy Sweeney
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

In the June 5th edition of the Tri-City Herald there is a picture and description of the oil train derailment next to the Columbia River showing an oil spill into the river and describing a fire. Coal is combustible and cars carrying coal have spontaneously started on fire in the past. We cannot afford to have even ONE coal train derailment of 125 cars. Thousands of tons of coal would end up in the river and/or potentially start on fire. I support the "no action" alternative for Millennium Bulk Terminals' facility in Longview, WA. Please say NO to coal exports. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003282***

Received: 6/13/2016 7:40:52 PM
Commenter: Tim Sweet
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am dead set against the building of the Longview terminal. In the age of global warming we should do everything in our power to phase out coal as an energy source. Further, having the increased rail traffic through our communities seems hardly worth the risk of derailments and disruption to the local commerce due to blocked crossings. Finally, how do we benefit in the communities along the way; I just don't see it.

Submission Number: ***MBTL-SEPA-DEIS-0001219***

Received: 5/26/2016 6:01:11 PM
Commenter: Renae Swenson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete it's time for progress. This draft EIS is exhaustive and quite frankly, overreaching. For instance, because the proposal is a terminal proposal, the use of the bulk commodity by a third party is a superseding and intervening cause to the combustion of coal. As a result of these superseding causes, the construction and operation of the terminal is not a proximate cause of the combustion of coal. Enough already! When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you.

Submission Number: ***TRANS-LV-M2-00075***

Received: 5/24/2016 12:00:00 AM
Commenter: Rodney Swenson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Rodney Swenson (phonetic). I'm a lifetime resident of Kelso, Washington. I live on N. Pacific, which runs parallel with the Cowlitz River and the railroad tracks that go north and south. I see no coal dust coming off those coal cars whatsoever.

I consider the history of Reynolds and the reduction aluminum plant. I feel the Millennium placement would be a far safer and less impact on our environment than what Reynolds was before. I'm a millwright, member of Local 96. Bring these jobs to us.

Submission Number: ***MBTL-SEPA-DEIS-0000575***

Received: 5/19/2016 6:17:22 PM
Commenter: Linda Swift
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Millennium Bulk Terminals proposed coal export terminal should be approved and the port should be allowed to move forward. It's good for Washington and her neighbors. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It’s about time! Cowlitz County is fraught with uncertainty. Millennium’s proposal, however, offers all the economic benefits of a long-term port facility without any of the uncertainty. Coal is needed by other countries to help shape their future and enhance their quality of life. Let's give other countries the living standards we have for ourselves.

Submission Number: ***MBTL-SEPA-DEIS-0002743***

Received: 6/13/2016 2:01:15 PM
Commenter: Theresa Switzer
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001939***

Received: 6/6/2016 1:55:41 PM
Commenter: David Szumigala
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing to you today to express my support for the Millennium Bulk Terminals project in Longview. I am glad to take this time for the opportunity to voice my support of this important project. The Millenium Bulk Terminals export project will re-use an existing industrial site and comply with the State's strict environmental standards. In doing it right, this project will create hundreds of jobs and strengthen Washington's trade economy. Railroads have always been a part of our community and railroads provide a very efficient means of getting goods to market. The jobs and taxes that are part of increased railroad traffic sustain our community. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. The draft EIS to evaluate Millennium Bulk Terminals proposed Longview project should be kept within reason. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with the process in a timely manner. It's the fair thing to do. Thank you for considering these comments.

Submission Number: ***MBTL-SEPA-DEIS-0002034***

Received: 6/6/2016 3:17:51 PM
Commenter: Tamerasidle
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing today to express my support for the Millennium Bulk Terminals project in Longview. I am glad for the opportunity to voice my support of this important project. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let’s be clear â€" the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project â€" without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. Thank you for listening.

Submission Number: ***MBTL-SEPA-DEIS-0002885***

Received: 6/13/2016 2:59:29 PM
Commenter: Rudolf Tankink
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000279***

Received: 5/10/2016 6:44:59 PM
Commenter: Jon Tanner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing today to express my support for the Millennium Bulk Terminals project in Longview. I am glad for the opportunity to voice my support of this important project. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold's site. They are an important part of our community and economy and will do even more great work once their permits are granted. Thank you for letting me submit my opinions and show my support for the project.

Submission Number: ***MBTL-SEPA-DEIS-0000131***

Received: 5/8/2016 5:08:19 PM
Commenter: Letitia Tarver
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please deny the building and operation of the coal terminal in the Kelso/Longview area. The terminal would create numerous environmental risks. Handling and eventually burning all the coal proposed would equal about 8100 additional passenger cars on the road inside Cowlitz County each year and the equivalent of about 672,100 more cars when the coal is burned to produce electricity, mostly in Asia. As a coastal citizen living alongside the great Columbia River, we are on the front line for sea-level increases and violent storms.

Submission Number: ***MBTL-SEPA-DEIS-0002014***

Received: 6/6/2016 2:59:47 PM
Commenter: Ajani Taylor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied, get on with it already. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0000656***

Received: 5/21/2016 5:12:33 PM
Commenter: Brenna Taylor
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

With a mission to protect, preserve and enhance Washington's land, air and water for current and future generations, and in wake of the recent King County Superior Court ruling that the Department Ecology has a legal obligation to ensure clean air and healthful environment for the people of the state of Washington, the DEIS study area and overall considerations given to the potential impacts from climate change are tremendously insufficient. The current area of study for climate impact is defined as the project area and access roads and rail leading to the project area. That is an unacceptably narrow area of study considering the environmental and climate impacts of mining, transporting and burning coal will not be confined within those parameters. The assessment of greenhouse gas emissions and climate change impacts requires a comprehensive analysis of the full effects exacerbating climate change will have on the current area of study and all of Washington State as a whole. Coal is considered to be the dirtiest fossil fuel as it produces more pollutants during the energy generation process than the other fossil fuel. Therefore, the EIS must comprehensively analyze the ramifications that will result from a project that perpetuates the extraction, transport and burning of coal. Continued anthropogenic greenhouse gas emissions will lead to further climate disruption for Washingtonians, causing an increase in temperature, rising sea levels, ocean acidification and changes in precipitation that can lead to drought and increased wildfires. The DEIS falls short in assessing how increased GHG emissions from the MBT project will directly contribute to further climate change disruption. Considerations and analysis should be given to how increased GHG emissions and climate change will affect the sustainability of ecosystems and biodiversity, as well as the availability of natural resources critical to local and regional economies. Such impacts should be considered with GHG emission projections from the 2015 Energy Policy Scenario (37,590,823 metric tons of CO2e over a 20 year period) and may also want to consider various other scenarios such as the Upper Bound Scenario (442,692,386 metric tons of CO2e over a 20 year period). The DEIS also fails to analyze the global impact of a continued net increase in GHG emissions as well as the urgent nature of decreasing GHG emissions to stave off the most catastrophic effects of climate change. Globally, climate disruption creates a multitude of issues, including the need for mass migration, an increase in frequency and intensity of natural disasters, health issues exacerbated by climate change, drought and global food insecurity, and a mass extinction our planet has not experienced since the loss of the dinosaurs 65 million years ago. These severe issues will not be felt in isolation, therefore they should also be considered in the EIS to determine the degree of impact they will have on Washingtonians. After revising the EIS to more comprehensively consider the full greenhouse gas and climate impacts of the proposed project, the potential climate change impacts should be reconsidered for their significance and necessitation of mitigation measures. Conclusions about any and all unavoidable and significant adverse environmental impacts must also be re-assessed at that time. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0000839***

Received: 5/24/2016 12:31:29 PM
Commenter: Clay Taylor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Longview is a town built on natural resources and import/export. I believe this project is a perfect fit for our community. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water â€" coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! It is important that regulatory agencies keep the playing field level by being fair and consistent. The permitting process for this coal export terminal should be similar to other export terminals. Sincerely, Clay Taylor ctaylor@jhkelly.com 98604

Submission Number: ***TRANS-SPOKANE-M2-00037***

Received: 5/26/2016 12:00:00 AM
Commenter: George Taylor
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. Thank you for your patience and long suffering. My name is George Taylor. I live in the lower south hill of Spokane. I'm a granddad and my two children, age 14 and 10 live with me.

We live about a mile from the train tracks, and I just want to echo the previous speaker who said we wipe coal dust from our porch on a daily basis.

I'm testifying against the proposed environmental disaster known as the Millennium Bulk Terminal in Longview that proposes to send 44 million tons of dirty coal through Spokane.

So, to me, it is clearly in the public interest and public health to deny this permit for Millennium.

Recently, U.S. Senator Jeff Merkley from our neighboring state of Oregon introduced federal legislation in Washington called Keep It in the Ground, referring to the important issue of keeping coal and oil, fossil fuels in the ground in Wyoming, Montana, and North Dakota, where they should be, and not extracting it from the ground and putting in mile-long trains to pollute the communities it passes through, including Spokane.

It risks increased diesel particulates, which have been referred here before, from the diesel engines pulling the trains, which are carcinogens, the hazards from the spilled coal dust and spilled coal on the tracks and environment.

But the biggest reason for preventing these trains is the danger to mother earth. The mother earth we all inhabit. By exporting coal and oil overseas to China and other countries -- oh, we're done. We're done. Please use the no action alternative.

Taylor, Jackie (0984)

Submission Number: ***MBTL-SEPA-DEIS-0000984***

Received: 5/24/2016 5:48:40 PM
Commenter: Jackie Taylor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the opportunity to add my voice to that of others in supporting the environmental study for the proposed port at Longview. The DEIS will present a clear picture of how Millennium Bulk Terminals will proceed in opening and operating this port and the economic, environmental, and social benefits of this project are deserving of approval. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water â€" coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Taylor, Sharon (0650)

Submission Number: ***MBTL-SEPA-DEIS-0000650***

Received: 5/20/2016 1:47:43 PM
Commenter: Sharon Taylor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. Washington is highly dependent on trade, and Cowlitz County desperately needs family wage jobs. An EIS that includes newly-invented forms of navel gazing should not have been necessary for a transportation infrastructure project that will facilitate foreign trade and create good jobs for our community. We need this project to move forward without further delays or unprecedented permit conditions. Thank you for listening.

Submission Number: ***MBTL-SEPA-DEIS-0001318***

Received: 5/26/2016 6:59:45 PM
Commenter: Tereasa Taylor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. This draft EIS is exhaustive and quite frankly, overreaching. For instance, because the proposal is a terminal proposal, the use of the bulk commodity by a third party is a superseding and intervening cause to the combustion of coal. As a result of these superseding causes, the construction and operation of the terminal is not a proximate cause of the combustion of coal. Enough already! The opening of Millennium Bulk Terminals proposed coal export facility will have a significantly positive impact not only on the state of Washington but the entire country. So I not only urge you to keep this permitting process moving forward at an efficient pace, but to also to accept the DEIS as sufficient. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001767***

Received: 6/2/2016 4:47:22 PM
Commenter: Tereasa Taylor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. Raising a family is tough, and this economy is not making it any easier. That's why we need to capitalize on any opportunity that we have to provide good-paying jobs that can support a family. The Millennium Bulk Terminal project will create jobs that can help families give their children the head-start that they need. There are men and women throughout the state that are waiting for the chance to work hard for their families. It simply makes no sense to turn them away at this point. Enough with the schedule delays, bring this process to a close.

Taylor, Tereasa (2283)

Submission Number: ***MBTL-SEPA-DEIS-0002283***

Received: 6/9/2016 4:51:03 PM
Commenter: Tereasa Taylor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. I greatly appreciate you considering my input.

Submission Number: ***MBTL-SEPA-DEIS-0003045***

Received: 6/13/2016 4:59:23 PM
Commenter: Terry Taylor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Despite all the rhetoric to the contrary about coal exports, I firmly believe you can have both good family-wage jobs and be good stewards of the environment. It doesn't have to be a choice of one over the other. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life. Sincerely, Terry Taylor 19taylor69@gmail.com 59323

Submission Number: ***TRANS-SPOKANE-M1-00010***

Received: 5/26/2016 12:00:00 AM
Commenter: Terry Taylor
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
My name is Terry Taylor, Colstrip, Montana.

I'm here testifying pro the terminal. I come from a small town in Montana, Colstrip. We're right in the center of coal. Montana has seven percent of the world's coal. We have the largest coal reserves in the United States there. I operate a small Ace Hardware with my granddaughters and my wife.

I feel as a nation, we're at a tipping point on where we're headed. Since 2009, we've had 20,600 regulations dumped on us from federal mandates, not from legislation. It's bringing our country to a very, very dangerous point. It affects every part of our lives.

President Obama wasn't able to get carbon tax legislation passed, so he's using the EPA to continue his war on coal. We have over 90 million people in America not working, dropped out of the labor force but they're not counted because we're still at 5.3 unemployment rate in America. One in five families don't have a working member to provide money for that family. Nearly 50 percent of all families receive some sort of government assistance. When are we going to take a stand in creating jobs in America that really produce an opportunity.

As a vendor to Peabody Coal, I received a bankruptcy filing last week. Just out of interest, I opened it and went through it. I was amazed there was 164 subsidiaries to Peabody Coal in America, 7,000 jobs are affected. Thank you very much.

Submission Number: ***MBTL-SEPA-DEIS-0001857***

Received: 6/2/2016 6:07:24 PM
Commenter: Todd Taylor
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study should move forward in a timely manner. Please allow me to provide my comments in regards to the draft EIS. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium's proposal. Now that the rail corridor has been studied, now it's time for progress on the Millennium project! Millennium Bulk Terminals in Longview is offering to create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.

Submission Number: ***MBTL-SEPA-DEIS-0001938***

Received: 6/6/2016 1:55:01 PM
Commenter: Matthew Teagle
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to submit my comments regarding Millennium Bulk Terminals proposed port at Longview. I fully support this project. This project is exactly the kind of economic boost that the state really needs. The benefits are numerous. The terminal would create jobs, generate significant new tax revenue, and help attract businesses to our area. In many ways, it can be a source of continued growth for years to come. It is tough to believe that a project with an obvious upside like this has been held up for so long. Those in charge should view this project for its benefits to the community and see it through to the finish. Our citizens are counting on it. I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Submission Number: ***TRANS-LV-M2-00107***

Received: 5/24/2016 12:00:00 AM
Commenter: David Teeter
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is David Teeter (phonetic). I live in Vancouver, Washington. I also work in Portland, Oregon for Greenpeace. So I heard that this is going to cost $680 million to create 300 permanent jobs. And I'm thinking to myself you could give 300 people 56,000 a year for 20 years and save $340 million.

But on top of that there's the climate change factor. We know this is going to add CO2 to our atmosphere. We know that CO2 generates melting of glaciers at a more rapid rate. That causes sea levels to rise. Between 1900 and Super Storm Sandy, New York City's sea level rose 30 centimeters. That 30 centimeters contributed to 80,000 additional homes being flooded.

So I propose to all of you you should definitely choose the no action alternative because this impacts a heck of a lot more than Longview, Washington.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001566***

Received: 5/31/2016 5:13:40 PM
Commenter: Randy Teig
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium's proposal. Now that the rail corridor has been studied, now it's time for progress on the Millennium project! Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed. Additionally, the continued opposition to opportunities that will help our children and our grandchildren is selfishness by people who either have jobs or are supported by other means. It is time for the citizens in this state and this community to stop expecting others to cary the load of protecting us and paying our way. Give people a chance to work and earn a future for their families.

Submission Number: ***TRANS-LV-Q2-00029***

Received: 5/24/2016 12:00:00 AM
Commenter: Caren Teigen
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

All right. My name is Caren Teigen. We live within four blocks of the railroad tracks in Castle Rock. And right now for the last couple of years, coal has been going by there. As I walk every morning down the road, we can already see coal being thrown off the coal cars. I worked at Reynolds Metals. I know what coal is like. I know what the dust is like. I've attended meetings. My father-in-law died from coal inhalation at Reynolds. His brothers died from working in coal mines. It's extremely dangerous. You may not know it now, but you will later. I have coal in my skin. And when I get out in the sun I get burned because it's like little mirrors. I don't know how they would ever contain it and hold their promise to it. I don't know how they would do that. (To grandson) What do you feel about it? (Grandson) I don't like coal. I was thinking about being a police officer. It would be better for some other kind of job in the community rather than coal. I don't think that it's going to provide the economy that we actually are thinking it would. A lot of people are misinformed. I've seen the pictures that they have in Canada, their coal terminal. And it's terrible. It's terrible. There is absolutely no reason for it. And I believe -- what I understand is that Japan is dropping down their use of coal anyway, so then we're going to be stuck with the coal sitting there. That's about all I have to say.

Submission Number: ***MBTL-SEPA-DEIS-0000362***

Received: 5/13/2016 2:00:06 PM
Commenter: Grace Teigen
Organization: The Give Art Foundation
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

We are against the coal terminal in Longview as we are against the oil terminal in Vancouver. Committing ourselves to such a short lived economic future dooms our region to a little "boom" and long term "bust". The damage that coal will do all along the way is a very large part of our concern. The loss of the property values, the major investment for most along the route is real and measureable. The negative impact on our environment in diesel fumes and coal dust is also real and measureable. We are at a crossroads in our region and can either be victimized by the preference for using our rail lines and the desireable grade at a cost to every citizen in every town and city and business and resident along the route. Please think outside of the Port of Longview and consider that a minor boost to the Port itself exacts an enormous loss to thousands and thousands of of your Northwest neighbors.

Submission Number: ***MBTL-SEPA-DEIS-0001883***

Received: 6/2/2016 6:28:40 PM
Commenter: Dave Teigland
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. In regards to coal dust & human health impacts: Please refer to the American Lung Association's report on state / county rankings. First please note that the incidence of pediatric and adult asthma for Cowlitz Co is 9.1%, Clark Co. is 9.0%, and Yakima Co is 8.9%. Then compare this same statistic to communities where coal is produced or shipped through such as Campbell Co WY at 9.0%, Box Butte Co, NE (Alliance) 6.96%, Lincoln Co NE (North Platte) 6.98%, or St. Louis Co MO 7.68%. Further, the ALA ranking for 24 hr particulate matter in Campbell Co WY scores a grade of B, as compared to Clark Co WA at F and Yakima Co WA at F. The evidence is obvious, coal production and transportation is not causing a health problem, but it can act as a remedy to an economic downturn. Thank you for your work to move forward with this project.

Teneau, Peter (3490)

RECEIVED
JUN 1 1 2016

MILLENNIUM BULK TERMINALS DEIS COMMENT
JUNE 11,2016

First some big facts. Big Coal is a dying industry, desperately attempting to foist its product on increasingly unreceptive nations. Chinese and Indian cities are choking on its pollution and as a consequence in an effort to survive are reducing reliance on coal consumption.

Analytical reports conclude that American export of coal to Asia faces a dim future. This is corroborated by plummeting demand overseas and shrinking investment in the US . It would appear that the Millennium project is a last gasp attempt to renew an unrealistic hope.

1. The Environment

In the building of the Millennium Terminal the Port of Longview facilitates CO2 emissions. CO2 knows no boundaries. Global warming, its consequences, are in my opinion the most critical factor in determining the worlds future livability. How can this not the weighed mightily into any comprehensive DIES.

2. Jobs

There are so many convincing reasons to reject The Millennium proposal and only one to support it – Jobs.

Huge port terminal operations are largely automated, so there is no employment bonanza anywhere close to compensating for the negative impacts of the Longview Terminal project when one includes its rail supply.

I am an ardent supporter of labor and jobs. It is painful for me to listen to workers testify on this subject however there are other ways of creating jobs- other ways of utilizing the Port of Kelso site with less risk than accommodating a collapsing coal company and greater opportunity for employing workers. What are needed are imagination, rigorous enterprise and redirection.

I make a counter proposal: Think hard and work fast on retraining for and production of alternative energy - a field competitive now, accelerating in growth and pregnant with new ideas for the future. In this context the Millennium Terminal continues the past disastrously while green energy opens the future opportunistically.

3. The Great Imbalance

A few jobs at the Port of Kelso versus a huge body of negative impacts with regard to human health, community disruption in traffic delay , overstress on rail capacity for other

commodity transport, and threat and degradation to the Columbia Gorgewith its beauty to mention a few. **THERE IS NO BALANCE HERE**.

The Millennium jobs,(when there are alternatives)in no way compensates for the cost that terminal and its supply trains impose on a vast region, its inhabitants and finally on the world at large. How can this be disputed?

Peter Teneau

Peter Teneau
2715 N. Terry St.
Portland, Oregon
97217

6/9/16

Submission Number: ***MBTL-SEPA-DEIS-0000589***

Received: 5/19/2016 6:33:40 PM
Commenter: Duane Tenold
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold's site. They are an important part of our community and economy and will do even more great work once their permits are granted. I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life.

Submission Number: ***MBTL-SEPA-DEIS-0000769***

Received: 5/23/2016 2:11:12 PM
Commenter: Reuben Teran
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don’t need to be told how to run its business. The rail line was unnecessarily studied â€" get on with it already. I’m certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

Submission Number: ***MBTL-SEPA-DEIS-0001252***

Received: 5/26/2016 6:20:01 PM
Commenter: Michael Terry
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close â€" and move on to a permit decision. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it’s time to move forward. It is important that the public have the ability to comment on projects of this nature as the affects will last for years to come. Thank you for the opportunity to comment and please see that this project is worthy and should be allowed progress forward and develop.

Submission Number: ***MBTL-SEPA-DEIS-0002417***

Received: 6/9/2016 6:22:01 PM
Commenter: Murray Terry
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close â€" and move on to a permit decision. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward.

Submission Number: ***MBTL-SEPA-DEIS-0002904***

Received: 6/13/2016 3:04:43 PM
Commenter: Murray Terry
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close â€" and move on to a permit decision. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward. Sincerely, murray terry 23gzamzow@ccsd1schools,net 82717

Submission Number: ***MBTL-SEPA-DEIS-0001422***

Received: 5/27/2016 9:52:40 AM
Commenter: Peter Terry
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I live in Spokane and I oppose the terminals. The increased rail traffic on the BNSF tracks that would result from this proposal is a safety concern. If the railroad was honest, which it is not, it would also be against this for the same reasons. Not only would it create increased congestion and more crossing risks, there is also a health risk of train derailment and coal dust. Living in Spokane I don't see any upside.

Submission Number: ***MBTL-SEPA-DEIS-0003118***

Received: 6/13/2016 5:47:21 PM
Commenter: Jim Thayer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. Raising a family is tough, and this economy is not making it any easier. That's why we need to capitalize on any opportunity that we have to provide good-paying jobs that can support a family. The Millennium Bulk Terminal project will create jobs that can help families give their children the head-start that they need. There are men and women throughout the state that are waiting for the chance to work hard for their families. It simply makes no sense to turn them away at this point. Thank you for your consideration. I look forward to seeing this project come to reality. Sincerely, Jim Thayer montanajim@ronan.net 59874

Submission Number: ***MBTL-SEPA-DEIS-0000455***

Received: 5/17/2016 7:23:41 PM
Commenter: Paul Thliveris
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Submission Number: ***MBTL-SEPA-DEIS-0002125***

Received: 6/7/2016 5:18:35 PM
Commenter: Aloma Thomas
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn't like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. There might not be many who know how much coal is used in everyday occurrences, but for those who do, know Millennium's project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both. Thanks for reading my comments.

RECEIVED
JUN 13 2016

Anita J. Thomas
1414 Kauffman Avenue, Apt. 201
Vancouver, WA 98660
June 11, 2016

MBTL SEPA Draft Environmental Impact Statement
c/o ICF International
710 Second Ave, Suite 550
Seattle, WA 98104

Re: Objections to MBTL on numerous grounds: health and safety, railroad deterioration, unsafeness of ship transport, global warming, and economic unviability

Dear Sepa Committee on MBTL DEIS:

As indicated above, my concerns about the proposed MBTL are legion. To start with, some can be focused on the dangers of coal dust intrinsic to the proposed terminal. Health concerns about coal dust coming off the proposed mound of coal at the terminal itself have been covered with far more expertise than I possess by the numerous health professionals who have offered testimony in this regard. Please pay due heed to their collective eloquence.

What has not been covered sufficiently is the danger coal dust on the railroads presents to the entire railroad corridor through the state up to Longview. The coal dust is so fine that it clogs the drainage of the road bed. The tracks are then more subject to sagging and therefore to derailment. The degraded railroad beds make the tracks more hazardous not only for the coal trains but for all the other trains that use the same tracks--oil trains, Amtrak, and miscellaneous freight. The 6-3-2016 oil train derailment near Mosier, OR in the Columbia Gorge underlines the necessity of keeping the tracks in the best condition possible to protect human safety, the environment, and affected business interests. Nor does the surfactant on the coal cars prevent coal dust from lifting off the trains, not to mention the considerable problems with the surfactants themselves. In a word, the coal trains contribute to making the rails unsafe. We need to phase out coal, not encourage more mining, transport, and export of it.

Other people have testified at length on concerns about global warming resulting from burning coal, a concern I heartily share and feel compelled at least to mention among my most pressing objections to this proposed terminal. Suffice it to say that a short-term theoretical economic gain that threatens the now-fragile climate stability of the entire planet at the expense of Washington State's treasured environment is economic foolishness of a breathtaking caliber.

There was nowhere near enough expert testimony outlining the risks of shipping the coal down the Columbia River, which simply may not be deep enough in places to accommodate the huge heavy ships intended to transport it. With reduced river flows such as we experienced in our area last year, problems with drafting are likely to increase

as erratic tributary flows can be expected more as the norm, thanks to global warming, than they historically were. Finally, these ships will encounter the treacherous bar at the mouth of the Columbia at Astoria, where they present a near-certainty of accidents before they make it out to the open sea.

Of course, the economic harms to salmon fisheries, recreational boating, Native American treaty and subsistence fishing rights all need due consideration. Such consideration has been neglected to this point in the DEIS deliberations and will be hard indeed to come by if MBTL goes through.

One could almost understand the desire for this project if it made economic sense. It does not. Numerous coal companies, most recently Peabody but more amazingly Millennium itself, have declared bankruptcy because of ever-lessening demand for coal. Cheaper markets for coal are available to China from Indonesia, and coal has simply been superseded by other, more efficient and often cleaner forms of energy. The economic promises of a dying enterprise are hardly worth the treasures of human health, safety, environment, and climate stability that we would be paying for this dirty and outmoded commodity. The limited number of jobs the project would ultimately provide if it were approved would likely be sadly short-lived, and they emphatically would not be worth the cost of their brief duration. It seems far more likely that when Millennium well and truly goes bust, Washington taxpayers in general and Longview taxpayers in particular will pay more in cleanup, lost property values, and health costs than they ever got from this doomed project. If MBTL is allowed, it seems likely to be nothing more than another taxpayer subsidy of a politically-connected but economically-incompetent industry.

It is within your purview to reject this project outright for all the reasons sketched above, along with numerous others covered by testimony of other people. Failing rejection, please craft the most rigorous standards your expertise can muster to mitigate the effects of MBTL on health, the integrity of railroad infrastructure, global warming, ship transport of coal through the Columbia and its Astoria bar, and MBTL's economic solvency. I emphasize here that the only mitigation possible regarding global warming is outright rejection of the project itself.

Please do your utmost to protect the citizens of Washington State and our treasured environment as you carry out your deliberations.

Yours most sincerely,

Anita J. Thomas

Submission Number: ***TRANS-LV-M2-00099***

Received: 5/24/2016 12:00:00 AM
Commenter: Anita Thomas
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Anita Thomas (phonetic). I live in Vancouver. You can tell by looking at my ex-husband's uncle that he had once been a powerful man. He had been a fireman on the coal trains. And the man was still a specimen of some note when I first saw him.

Yes, I used to be able to see. He was over six feet tall, was still erect, and was very broad in the shoulders. But he was spending his twilight years sitting in the living room with the television, and his devoted wife was doing all the house maintenance and everything else because of the number that the coal dust did on his lung.

The coal dust does a number on the tracks. It blocks them, keeps the drainage from happening, and increases the chances of derail, so that the oil trains and Amtrak that follow may also derail. The coal industry itself, like the steam engines that Uncle Forrest used to work on is a dying industry. It's part of the past.

And the concern is that the Millennium people will leave you with a mess that you will have to pay to clean up and that you will be stuck with the health effects. Bone and blood is the price of coal. Hearts and lungs are the price of coal, of coal.

Submission Number: ***MBTL-SEPA-DEIS-0001325***

Received: 5/26/2016 7:02:34 PM
Commenter: Micah Thomas
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly support the project and the thousands of jobs this project will create. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let’s be clear the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0001430***

Received: 5/27/2016 3:44:41 PM
Commenter: Mike Thomas
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Our state, our country, our world has made pledges and regulatory law to decrease carbon emissions. I hold that commitment to be not only the burning of carbon energy sources but also of the sale, transportation, and development of this polluter. Thus the immense pollution that this project will represent flies in the face of our decisions to reduce carbon. We cannot be a participant and claim it is other's responsibility. I have boats in the Kalama marina that will be within a football field's length to the railroad tracks used to transport the coal. The to and from of the railroad cars will create ash (the liquid sealer will not be applied to returning cars that will still carry ash) deposits on the river, boats and environment. I am very much against this project for environmental reasons.

Submission Number: ***MBTL-SEPA-DEIS-0003206***

Received: 6/13/2016 6:32:12 PM
Commenter: Raymond Thomas
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0002239***

Received: 6/8/2016 3:53:15 PM
Commenter: Bill Thompson
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Please allow this project to continue with the least amount of regulatory delays possible. This is a great way for America to create good paying sustainable jobs. Exporting products mined or manufactured in the United States is tremendous way to grown and expand our economy.

Submission Number: ***MBTL-SEPA-DEIS-0000385***

Received: 5/16/2016 8:24:35 PM
Commenter: Gloria Thompson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. When the trains are loaded in Montana, Millennium puts a liquid coverâ€"like a glueâ€"on top of the cars. This eliminates a lot of the coal dust that would normally come off of train cars. Millennium is building this world class export facility right! Remember what matters and keep the focus local! This project will create additional revenue for a state that, like many others, can really use the economic boost. Through the entire construction process it will employ a significant amount of people and go a long way toward revitalizing Washington. I feel we should make this coal export terminal a reality. Thank you for considering my comments.

Submission Number: ***TRANS-SPOKANE-M1-00069***

Received: 5/26/2016 12:00:00 AM
Commenter: Jackie Thompson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm Jackie Thompson from Redmond, Washington.

A lot of people have talked about jobs and jobs kept or jobs lost and how much money that's involved with that.

There's some external costs of coal to the economy that people haven't particularly addressed. A lot of people have addressed health care, particularly fine particulate effect on children. There's also reduced effects by reduction of agriculture and timber yields that has to be considered.

Then there's also the cleanup bill. There's an article in The Wall Street Journal that says they are estimating -- the coal companies are estimating 723 billion dollars in cleanup costs.

Now, Peabody Coal just declared bankruptcy and a bunch of others have already done so including Arch, which I believe is in the Wind River that people are mentioning, but they're still bonded. There's not going to be any money for cleanup. In that case, who gets to pay for it? The people who live there probably. All of us in the United States, no doubt. The coal company is not going to be paying that.

Coal is a dying industry. Supporting this is like buying stock in buggies and whips at the time of the Model T Ford. Investing in infrastructure to support coal is much better spent on cleanup, education, and transition to sustainable energy now. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001638***

Received: 5/31/2016 6:08:34 PM
Commenter: Joe Thompson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. There might not be many who know how much coal is used in everyday occurrences, but for those who do, know Millennium’s project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both. Thanks for reading my comments.

Submission Number: ***MBTL-SEPA-DEIS-0001576***

Received: 5/31/2016 5:21:08 PM
Commenter: Josh Thompson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. In Longview, 56% of kids need free and reduced price lunch at schools and go home to neighborhoods facing 8% unemployment. We cannot afford to look the other way when projects in this area guarantee new jobs and private investment in our schools, roads, and local services. In fact, the estimated number of jobs related to construction activity at the Millennium Bulk Terminals project is 1,350 temporary direct jobs - that will mean $70 million in direct wages! When the project is completed there will be about 135 direct jobs and about 165 indirect jobs. These numbers simply cannot be ignored. Remember this project’s economic benefits to the local community. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***TRANS-LV-M1-00052***

Received: 5/24/2016 12:00:00 AM
Commenter: Kathy Thompson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Hi. I'm Kathy Thompson. And with my husband Steve Pulliam I sell homes in Longview, Washington and Cowlitz County. Over the years we've conducted hundreds of community tours for prospective employees who are thinking of moving here. And we tell them all the great things about our community. But we already have some pretty big obstacles in attracting new doctors, new managers, new pharmacists, new nurses to come to our community and to stay here. And we have never, in the years we've worked here, ever had someone say, gee, if you only had a coal exporting terminal I would love to move to your community. And right after Millennium made their announcement, we did receive several calls from clients who said they wanted to put their homes on the market and sell them before the coal terminal brought in tons -- massive tons of coal that ruined both their views and the pricing of their homes. Residents in a community that's three miles away from the West Shore Coal Export Terminal in Vancouver BC, complained that coal dust blackens their homes, blackens their patio furniture, blackens their gardens, blackens everything. And that's a community that three miles away interest the coal term that he will but lowest the long have you is within three's miles away from a coal terminal that most of Longview is within three miles of the proposed Millennium Coal Terminal. So we would need to expect to have a lot of coal on our homes and ourselves and everything. And a study by the Eastman Company concluded that dramatic increases in just the coal train traffic would reduce the prices of homes depending on the proximity to the train tracks it might be between five and twenty percent. EVENT HOST: Thank you. SPEAKER 44: We support the no action on coal. EVENT HOST: Happy to have you leave a copy of your comments if you'd like. Sir?

Submission Number: ***MBTL-SEPA-DEIS-0003131***

Received: 6/13/2016 5:53:00 PM
Commenter: Norris Thompson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

In a time that has included seeing neighbors and friends out of work and under-employed, we need to encourage economic development. In my opinion, that cannot happen soon enough. That is why I am writing today. Ultimately, global warming and the impact of fossil fuels on the environment are national government and international government issues and did not need to be studied in this DEIS. Now that it's done, let's move on to the final EIS! It is important that regulatory agencies keep the playing field level by being fair and consistent. The permitting process for this coal export terminal should be similar to other export terminals. Sincerely, norris thompson norristhompson34@msn.com 59323

Submission Number: ***MBTL-SEPA-DEIS-0001966***

Received: 6/6/2016 2:14:27 PM
Commenter: Patricia Thompson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. This is an old industrial property being redeveloped. Keep the review to what is normal and factual.

Submission Number: ***MBTL-SEPA-DEIS-0001611***

Received: 5/31/2016 5:48:15 PM
Commenter: Roberta Thompson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

t's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium’s proposal is unprecedented and has far reaching economic implications. Thanks for the ability to comment. I believe the final environmental review needs to be released ASAP!

Submission Number: ***MBTL-SEPA-DEIS-0001950***

Received: 6/6/2016 2:03:23 PM
Commenter: Russ Thompson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The proposed coal export terminal at Longview should be approved. Millennium Bulk Terminals has a clear and environmentally-sound plan that will be studied to make this port a reality and it will do much to contribute to the economy and vitality of the region and the country. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and should be treated as such. An environmental review of this time and scope should not have been needed to redevelop an old smelter site. The Draft EIS is sufficient, it’s time to move forward. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0002270***

Received: 6/9/2016 4:36:11 PM
Commenter: Steve Thompson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It has occurred to me that living with a coal mine, coal train, or coal export facility is kind of like living with a neighbor who is not responsible for his dog. Have you ever had a neighbor's dog think that your yard was the place to leave his waste and the neighbor just ignored that fact? An occasional event can be tolerated but by the third or fourth time that you catch that scent as you are walking on the new carpet in your house or are in your car and late for an appointment, it is hard to tolerate. To make matters worse, that neighbor starts claiming that you are unfair to point out to him that his dog is messing in your yard. After all it could be anyone's dog, certainly not his. So you have to prove that his dog is the source of the waste. But then the neighbor, who does not like to be held accountable, goes to the city and says that "some waste" should be OK. It would be unreasonable to expect the owner to clean up all the dog waste. Because the neighbor has donated large sums of money to the campaigns of the mayor and city council, the city sets "minimum allowable standards" which the neighbor lobbies to be a large as possible. Thus it is now legal for the dog to leave deposits on your property. But wait there is more. The neighbor wants to get more dogs (a little business manufacturing puppies) so he hires a PR firm which promotes the good character of the neighbor and convinces the politicians that the number of dogs allowed by home owners should be increased. So now that dog waste is distributed on not only your lawn, but also those of other neighbors, the sidewalks, bike trail and everyone's driveways. Occasionally this politically savvy dog owner makes a conspicuous point of walking his dog with plastic bag in hand. But you notice that he seldom arrives home with a used bag but those full bags show up along the trail. Alas because the neighbor has lobbied to defund animal control so there is little enforcement of the "large allowable standards." Of course little of this changes the fact each time you encounter a pile of shit deposited on your lawn or the public space. Please note that I am talking about the neighbor, the dog owner, not the dog. The fossil fuel industry has been acting like the irresponsible dog owner. The coal corporations have been active in all the irresponsible activities similar to the dog owner, including ignoring waste, particularly carbon waste, actively denying even the existence of waste and its impact on the commons, forcing the public to prove the existence of a problem, hiding waste, spending huge amounts of money on public relations advertising, political lobbying to set high minimum allowable levels of contamination, and paying legal firms to delay and minimize responsible enforcement. The fossil fuel industry, including the coal companies, could choose to be good neighbors in the same way that most dog owners are good neighbors. Those coal companies could choose to become renewable energy companies. They could use the money they now spend in negative ways to create new renewable energy jobs and technologies. But since they are not making that choice, I ask you, as the decision makers for our common good, please revise the Draft EIS to address all the contributory but "allowed", "not regulated" or "below minimum" sources of pollution. The cumulative effect of these contributions to the overall waste in our environment are unnecessary and degrade the atmosphere of all living organisms. The more I read the Draft EIS, the more this simple analogy resonated. Statements such as "does not exceed standards", "no standards apply" or "none would exceed regulatory limits" are all ways that just allow for more dog poop to accumulate that we citizens have to live with. At a time when we should be making the world better, we are living with a set of rules lobbied for by an industry which keeps making our world worse. The truth is that we don't really know where the tipping point lies but projects like Millennium will move us closer to the edge. Additional Items-- • I did not see addressed the effect of added carbon in the atmosphere and its effect on ocean acidification (OA). OA is already causing major problems for Washington and Oregon shellfish. The tipping point is already happening as declines in reproductive health of oysters, crab, and other shell fish and probably many feeder organisms. • Please consider another item related to coal dust along the tracks. There is no safe level for lead in water. We know that lead is in the coal dust. Run off from those tracks will end up in waterways where lead will accumulate in the organisms within the food chain. The fossil fuel industry has for years promoted the jingle, "The Solution to Pollution is Dilution" which has gotten us into the problem we now face. There are moss and lichen studies demonstrating damage along the tracks.

Thompson, Steve (2270)
• How can you say alth hazards exist when many a coal miner has died from Black Lung? • I am not surprised that the Cowlitz County study of dust from coal trains showed few of the fine particles. Those small particles on the surface of the load would have been the first to blow off several hundred miles prior to arriving in Cowlitz County. Once that coal gets moving around the terminal, it will expose many more of those fine particles which will end up in the water. • Please add air monitoring on the ship loading systems to get an idea of how much is ending up in the water. Since you are expecting a quarter teaspoon per square meter outside the project area, how much are you expecting over the water which is inside the project area? This water in the river is moving and will spread the lead, arsenic, and other contaminants again to the food chain.

Submission Number: ***TRANS-SPOKANE-M1-00059***

Received: 5/26/2016 12:00:00 AM
Commenter: Steve Thompson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. My name is Steve Thompson from Redmond, Washington formerly of Longview, Washington.

It has occurred to me that living with coal mine, coal train, or coal export facility is kind of like living with a neighbor who is not responsible for his dog. Have you ever had a neighbor's dog think that your yard was the place to leave his waste and the neighbor just ignored the fact?

Occasionally that can be ignored, but by the third or fourth time you catch that scent as you're walking on your new carpet or in your car late for an appointment, it's hard to ignore.

Now to make matters worse, that neighbor starts claiming that you were unfair to point out to him that his dog is messing in your yard. After all, it could be anyone's dog, certainly not his.

So you have to provide proof that the dog is the source of the waste but then the neighbor goes to the City and says that his taxes should not be used to pay for animal control, and that function is defunded because neighbors donated large sums of money to the campaigns of the mayor and the city council. But wait, there's more.

Now the neighbor wants to get more dogs and convince the politicians that the number of dogs allowed by homeowners should be increased. So now the dog's waste is spread not only on your lawn but also on other neighbor's, sidewalks, bike trails, everyone's driveways. This neighbor wants to be seen as a good guy, so he brings up all that he does for the City.

Now occasionally this savvy dog owner makes a point of walking his dog with a plastic bag in hand and use those bags along the trail. No wonder, what was this person thinking?

Please know that I'm talking about the -- I'm not talking about the neighbor -- I'm talking about the neighbor, the dog owner, not the dog.

The fossil fuel industry has been acting like an irresponsible dog owner. The coal corporations have been active in the irresponsible activities of the dog owner including waste, carbon waste, actively denying even the existence of waste, forcing the public to prove the existence of waste.

Submission Number: ***MBTL-SEPA-DEIS-0001745***

Received: 6/2/2016 12:55:21 AM
Commenter: Sunny Thompson
Organization: wellspring spa at mt rainier
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for your careful review of this project. Please keep in mind the local and regional impacts of this enormous terminal, but mostly, please be mindful what the planetary impact would be if we participate in the process of allowing this much coal to be burned and the CO2 released into the atmosphere. Each of you are in a very fortunate position to make a decision that your children and their children will be proud of you for making. Please use far seeing mind and make the right decisions. Thank you . ~ Sunny Thompson

Submission Number: ***MBTL-SEPA-DEIS-0002906***

Received: 6/13/2016 3:06:03 PM
Commenter: William Thompson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000655***

Received: 5/21/2016 6:41:28 AM
Commenter: Amy Thompson-Bernard
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

To whom it may concern, If this terminal is not constructed the end result will be that our economy will be impacted, jobs will continue to be lost, more mines will be closed, States will be forced to cut back on critical services, all in all this will be a bad decision. Since the terminal will use already extant rail lines, with relatively short tie ins to main tracks then environmental impact should be limited on that end. This is a matter that will benefit all coal producing Western states & should be encouraged to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0001230***

Received: 5/26/2016 6:07:05 PM
Commenter: Bryon Thornburg
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. When the trains are loaded in Montana, Millennium puts a liquid cover like a glue on top of the cars. This eliminates a lot of the coal dust that would normally come off of train cars. Millennium is building this world class export facility right! Remember what matters and keep the focus local! Thanks for the ability to comment. I believe the final environmental review needs to be released ASAP!

Submission Number: ***MBTL-SEPA-DEIS-0003274***

Received: 6/13/2016 7:30:33 PM
Commenter: Shayla Thorne
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002330***

Received: 6/9/2016 5:23:35 PM
Commenter: Brad Thorstenson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0002486***

Received: 6/10/2016 2:29:08 PM
Commenter: Donald Threewitt
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I support the full development of the coal terminal.

Submission Number: ***MBTL-SEPA-DEIS-0001748***

Received: 6/2/2016 3:01:42 AM
Commenter: Nina Thrun
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The draft EIS does not address the effects of the noise pollution along the tracks. Communities all along the railroad tracks along that route will be affected. Scientific research in peer reviewed journals has shown a greater risk of cardiovascular effects due to noise pollution. Noise pollution will be greatly increased due to the very long trains and the high number of trains passing through all these communities. The city of Camas has passed a resolution concerning deleterious effects of the coal trains

Testimony on coal shipments, May 24, 2016

My name is Nina Thrun

My profession is a Clinical Research Associate. I've worked in Clinical Research for 19 years. I live in Camas, with my husband.

We moved to Camas to live in this beautiful un-polluted, quiet area. My husband had a heart attack a few years ago and stopped smoking.

The coal trains traveling through Camas will release **significant** amounts of diesel particulate matter and coal dust and will increase noise pollution.

A review of scientific literature shows that the human body is not equipped to safely process the toxic side effects of air pollution any better than it is able to process cigarette smoke.

Data in medical journals shows that:

Diesel particulate matter is associated with increased cardiopulmonary mortality and increased heart attack rates. No safe threshold has been established. [1)]

Noise pollution
In adults, short term and long term adverse health effects of noise pollution have been documented, including heart disease and strokes [2), 3)]

We built a house in Camas, in what was a quiet, unpolluted area. We plan to stay here for the rest of our lives. I am very concerned that the proposed coal trains will increase the **cardiovascular adverse health effects** on my husband and all Camas residents. There are many other adverse **health** effects of diesel particulate matter, coal dust and noise pollution, but this effect concerns me deeply.

Please study the impact of the proposed coal trains on **cardiovascular health and health in general.**

References:
The following is a comprehensive review, by the American Heart Association, of 426 journal article references.

1) Particulate Matter Air Pollution and Cardiovascular Disease: An update to the Scientific Statement from the American Heart Association. *Circulation* 121:2331 – 2378

P.T.O

2) Selander J, Milsson ME, Bluhm G, Rosenlund M, Lindqvist, M Nise G, Pershagen G. Long-Term exposure to road traffic noise and myocardial infarction. *Epidemiology* 2009; 20(2) 22 – 279

3) Willich, SN, Wegscheider K, Stallmann M et al. Noise burden and the risk of myocardial infarction. Eur Heart J 206; 27: 276 – 282

Testimony, Nina Thrun, 612 N E Oak St, Camas, WA. Telephone 360 834 7950

Submission Number: ***MBTL-SEPA-DEIS-0001600***

Received: 5/31/2016 5:38:06 PM
Commenter: Gerald Thuente
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My comments pertain to the draft EIS for the Longview coal export facility. I hope you will give them good consideration. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. Thank you for letting me submit my opinions and show my support for the project.

TIDEWATER
TRANSPORTATION & TERMINALS

June 9, 2016

Cowlitz County
Department of Building and Planning
207 Fourth Avenue North
Kelso, WA 98626

Washington Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504

RE: Comments for Draft Environmental Impact Statement (DEIS)
Millennium Bulk Terminals - Longview

Dear Cowlitz County and Washington Department of Ecology:

We are writing to voice Tidewater Barge Lines' (Tidewater) support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review.

Tidewater is a marine transportation and terminal services company based in Vancouver, Washington. Tidewater has been in business since 1932, employs approximately 300 people, and operates a fleet of 18 towboats, 170 barges and five marine terminals on the Columbia and Snake River system.

Tidewater is committed to environmental stewardship in the Pacific Northwest and its waterways. That being said, we have reviewed the DEIS and support the conclusion that the Millennium Bulk Terminal can be constructed and operated in a safe and environmentally responsible manner. We did not identify major cumulative impacts from the project. Most impacts noted in the DEIS are either negligible or minor and can be mitigated. The few potential major impacts have very low probability of occurring and planning, prevention, response and mitigation activities can reduce or eliminate impacts.

We also wanted to provide the following information that is not included in the DEIS:

Chapter 5 - Operations, Section 5.4 – Vessel Transportation

Subsection 5.4.3.1 – Information Sources (pages 3-4)

TIDEWATER
TRANSPORTATION & TERMINALS

We find no record either in this subsection or anywhere else in the DEIS that mentions that Columbia River towing operators such as Tidewater were directly contacted to collect vessel transportation information. We suggest contacting Tidewater and other the towing operators mentioned in the DEIS due to the fact that they been safely operating on the Columbia River for many years. Furthermore, our industry's incident statistics and safety record shows that the towing industry in Washington has one of the best programs for moving commodities in the nation.

For example, Tidewater is compliant with regulations from many state and federal agencies. Meeting the agency requirements, in addition to our customer's requirements such as those of the Oil Companies International Marine Forum's (OCIMF) Ship Inspection Report Programme (SIRE), Tanker Management Self Assessment (TMSA) and Marine Terminal Management Self Assessment (MTMSA) programs, as well as the American Waterways Operators' (AWO) Responsible Carrier Program (RCP), results in 75 – 100 audits and inspections of Tidewater's vessels, facilities and programs on an annual basis. The continuous improvement afforded through these audits and inspections has resulted in Tidewater's achievement of a Best-of-Class incident record and an industry-leading barge design and construction for transporting commodities.

In addition, Tidewater is capable of responding to a potential spill into the Columbia River system. We did not find mention of our capabilities in the DEIS, so wanted to include the following information:

Tidewater is a Primary Response Contractor for Washington State's Department of Ecology and is able to respond to a spill to the Columbia River system. Tidewater has equipment that can be deployed and personnel trained in Hazardous Waste Operations and Emergency Response (HAZWOPER) and the Incident Command System (ICS).

Here is a summary of Tidewater's personnel and equipment that can be deployed following a spill into the Columbia River system:

- **Containment Boom – 32,100 feet**
- **Barge and Tank Storage – 94,935 bbls**
- **Boom Boats – 21 boats**
- **Vessels of Opportunity (VOO) – 18 tug boats and 4 work boats**
- **Skimmers – 18 skimmers**
- **Vacuum Trucks 13 80-120 bbls**
- **Drop Boxes - 100+ boxes**
- **Pumps (trash, centrifugal, diaphragm, vacuum) – 36 pumps**
- **Response Trailers – 10 trailers**
- **HAWOPER Trained Personnel – 65 People**
- **ICS Trained Personnel – 75 People**

6305 NW Old Lower River Road, Vancouver, WA 98660 • 360.693.1491 • www.tidewater.com

TIDEWATER
TRANSPORTATION & TERMINALS

Finally, we believe that the aforementioned information is relevant to the DEIS when making conclusions about the "Unavoidable and Significant Adverse Environmental Impacts" for vessel transportation.

Subsection 5.4.8 - Unavoidable and Significant Adverse Environmental Impacts (page 47)

The conclusions in this subsection were formed without all of the pertinent vessel transportation information. We believe that if you had involved the Columbia River's towing operators to understand their Best-Of-Class operations and emergency spill response capabilities, that classifying vessel incidents as having "Significant Adverse Environmental Impacts" would not be an appropriate conclusion.

We now want to comment on the economic impacts of the Millennium Bulk Terminal project. Tidewater is one of many companies that account for nearly forty percent of all Washington jobs that are tied to trade related activity. And with our state's economy tied so closely to trade, it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit.

In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest.

In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project.

Thank you for your consideration and the opportunity to comment on this important matter.

Sincerely,

Robert A. Curcio
President & CEO

Myron Reising
Chief Financial Officer

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TIDEWATER
TRANSPORTATION & TERMINALS

Bruce Reed
Chief Operating Officer

Andy Stephens
Vice President of Business Development

William H. Collins
Director of Environmental, Health, Safety & Security

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Submission Number: ***TRANS-LV-Q3-00012***

Received: 5/24/2016 12:00:00 AM
Commenter: David Konz
Organization: Tidewater Barge Lines
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is David Konz, and I'm with Tidewater Barge Lines. I would like to read a statement on behalf of Tidewater's management team.

I am here today to voice Tidewater's support for the proposed Millennium Bulk Terminal facility in Longview that is currently undergoing environmental review.

Tidewater is a marine transportation, a terminal company based in Vancouver, Washington. We have 300 employees, have been in business since 1932, to have a fleet of boats, barges, and marine terminals that operate on the Columbia River.

Tidewater is committed to environmental stewardship in the Pacific Northwest and its waterways. That being said, we have reviewed the DEIS and support the conclusion that the Millennium Bulk Terminal can be constructed and operated in a safe and responsible manner.

We did not identify any major cumulative impacts from the project. Most impacts noted in the Draft EIS are either negligible or minor and can be mitigated. There are a few potential major impacts that have very low probability of occurring and planning prevention response and mitigation activities can reduce or eliminate these impacts.

We now wanted to comment on the economic impacts of the project. Tidewater is one of many companies that account for nearly 40 percent of all Washington jobs in the state that are tied to trade.

Millennium Terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2600 direct and indirect jobs during construction with a total of 300 full-time direct and indirect jobs generated once complete.

In conclusion, the proposed Millennium Bulk Terminal Project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure that environmental standards are maintained.

Higher standards of living and long-term security for the families of Washington are sure to accompany this project. Thank you for the consideration and the opportunity to comment on this important matter.

Submission Number: ***TRANS-PASCO-Q3-00001***

Received: 6/2/2016 12:00:00 AM
Commenter: John Sherman
Organization: Tidewater Terminals
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is John Sherman, and I am the general manager for Tidewater Terminals Company in Pasco, Washington. I am here today to express Tidewater's support for the proposed Millennium Bulk Terminal export facility in Longview that is currently undergoing environmental review.

Tidewater is a marine transportation and terminal company based in Washington state. Tidewater has been in business since 1932, employes approximately 300 people, operates a fleet of 18 tugboats, 170 barges, and five marine terminals on the Columbia and Snake River system including a terminal located in Pasco, Washington.

Tidewater is committed to environmental stewardship in the Pacific Northwest and its waterways. That being said, we have reviewed the Draft Environmental Impact Statement, otherwise known as DEIS, and support the conclusion that the Millennium Bulk Terminal can be constructed and operated in a safe and environmentally responsible manner.

We did not identify major cumulative impacts from the project. Most impacts noted in the DEIS are either negligible or minor and can be mitigated. The few potential major impacts have very low probability of occurring and planning, preventions, response, and mitigation activities can reduce or eliminate impacts.

We also wanted to provide the following information that is not included in the DEIS under Chapter 5, Section 5.4.3.1, vessel transportation, information sources. We find no record either in this section or anywhere else in the DEIS that mentions that the Columbia River towing operators such as Tidewater were directly contacted to collect vessel transportation information.

We suggest contacting Tidewater and other towing operators mentioned in the DEIS due to the fact that they have been safely operating on the Columbia River for many years. Furthermore, our industry's incident statistics and safety record shows that the towing industry in Washington has one of the best programs for moving commodities in the nation.

We now want to comment on the economic impacts of the Millennium Bulk Terminal project. Tidewater is one of the many companies that account for nearly 40 percent of all Washington jobs that are tied to trade-related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90 percent of Washington exports come from small to medium size business with less than 500 employees such as Tidewater.

With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit.

In fact, the Millennium Bulk Terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction with a total of 300 full-time direct and indirect jobs generated once completed.

Additionally, the tax revenues from the project, both during construction and then ongoing during its operations, will support projects and services for the State's citizens. But with trade expected to grow across the state and certainly along the Columbia River, securing new privately-funded investments today will ensure long term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest.

In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long term security for the families of Washington are sure to accompany this project.

Thank you for your consideration and the opportunity to comment on this important matter.

Tidwell, Ray (3784)

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☐ Greenhouse Gas
- ☐ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

I SUPPORT THE MILLENNIUM PROJECT
IT SOUNDS LIKE ALL THE ENVIRONMENTAL
CONCERNS HAVE BEEN WONDERFULLY COVERED
HAVING WORKED PREVIOUSLY ON E.I.S.'S
I AM IMPRESSED WITH THE QUALITY OF
THIS STUDY.
JOBS ARE SO MUCH BETTER THAN WELFARE
WELFARE IS WHAT RESULTS FROM

(additional space is provided on the back)

(comment continued)

Tidwell, Ray (3784)

PEOPLE THAT OBJECT TO PROGRESS

Ray Tidwell
PASCO WA

Submission Number: ***MBTL-SEPA-DEIS-0001239***

Received: 5/26/2016 6:12:36 PM
Commenter: Robert Tilden
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. Enough with the schedule delays, bring this process to a close.

Submission Number: ***MBTL-SEPA-DEIS-0001629***

Received: 5/31/2016 6:03:21 PM
Commenter: Eric Tillotson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don’t hold them up any longer.

Submission Number: ***MBTL-SEPA-DEIS-0002798***

Received: 6/13/2016 2:27:28 PM
Commenter: Eric Tillotson
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000223***

Received: 5/10/2016 5:04:26 PM
Commenter: Chuck Tilton
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I support American jobs and the proposed port at Longview will create much needed employment for hundreds of Americans. Please include my comments as part of the public response to Millennium Bulk Terminals plan. Current world markets and decision in East Asia re capital allocation over the last decade demonstrate that American coal exports are not necessary to, nor causally-related to, decisions in China, Korea or Japan to build coal-fueled power generation capacity. The environmental impacts will occur regardless of Cowlitz County and Ecology decisions to grant permits for construction of the project-specific docks and terminals in question. Millennium Bulk Terminals EIS should be thorough but held to the same standards as any other port proposal. We need to do everything we can to strengthen and grow the economy of Washington and the west in general. The project proposed will do just that. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001786***

Received: 6/2/2016 5:05:17 PM
Commenter: Warren Tilton
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium's proposal. Now that the rail corridor has been studied, now it's time for progress on the Millennium project! Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

Submission Number: ***MBTL-SEPA-DEIS-0001499***

Received: 5/31/2016 1:56:35 PM
Commenter: Jeff Dafler
Organization: The Timken Company
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Sir or Madam: I am writing on behalf of The Timken Company to voice my support for the proposed export facility in Longview that is currently undergoing environmental review. Timken is a global maker of bearings, gears and other industrial equipment with operations in Ferndale and Pasco, Washington. I am pleased that the Washington Department of Ecology and Cowlitz County concluded that the project area would experience no significant adverse environmental impacts from the port expansion. I am, however, deeply concerned that the draft environmental report recommends that the owners of the terminal mitigate the greenhouse gas (GHG) emissions not only of the project itself but the goods being shipped through the terminal. This is dangerous precedent for manufacturers who export their products, all of which contain an environmental footprint. Federal and state environmental permitting laws all consistently set the scope of an infrastructure review to local environmental impacts. By forcing the terminal operators to account not only for the local environmental impacts of the port expansion but also the global environmental footprint of the cargo, the Department of Ecology and Cowlitz County are creating a harmful precedent that could be used to impede exports of all products, not just in Washington but from ports across the country. That could harm manufacturers and their employees, who rely heavily on exports to compete in a global economy. Thank you for the opportunity to comment. I urge the agencies to issue final permits for this project as quickly as possible and remove language related to the mitigation of emissions from goods being shipped through the terminal. Sincerely, Jeffrey R. Dafler Vice President – Government Affairs The Timken Company

Submission Number: ***MBTL-SEPA-DEIS-0002873***

Received: 6/13/2016 2:56:23 PM
Commenter: Darrell Tiner
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
It is time to move forward and make progress

Submission Number: ***MBTL-SEPA-DEIS-0002551***

Received: 6/12/2016 4:05:10 PM
Commenter: Val Tinney
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

As a lifelong member of the community here in SW Washington, I have seen the negative effects on our community that the loss of good paying family wage jobs has caused. We are a community that has been hit hard over the last two decades by job losses in the timber community, and on our industrial base. We need jobs! I believe the EIS review of the Millennium Bulk Terminals has been extensive, and competently done, and see no reason this project should not move forward. My family and I support the proposed port facility in Longview, WA. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001917***

Received: 6/4/2016 5:16:49 PM
Commenter: Ann Tlustos
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

When eleven cars of the 96-car Union Pacific train jumped the tracks west of the town of Mosier on June 3, 2016, next to Rock Creek that feeds the Columbia River, its impact on land and wildlife, interstate traffic, schools, and residents proved that the long-standing fear of the risks of hauling crude oil through one of the Pacific Northwest's most renowned landscapes—the Columbia River Gorge—are real. The cause of the derailment is currently under investigation, but one possible growing cause could be track failure. An October 7, 2015, article in the Los Angeles Times concerning the Norfolk Southern train derailment that sent 4,300 gallons of crude oil into the landscape in western Pennsylvania states "The cause of the accident in North Vandergrift was identified as a failure in the rails — not aging or poorly maintained tracks, but a relatively new section laid less than a year earlier. The February 2014 crash fits into an alarming pattern across North America that helps explain the significant rise of derailments involving oil-hauling trains over the last three years, even as railroads are investing billions of dollars in improving the safety of their networks. A review of 31 crashes that have occurred on oil trains since 2013 puts track failure at the heart of the growing safety problem. Track problems were blamed on 59% of the crashes, more than double the overall rate for freight train accidents, according to a Times analysis of accident reports. Investigators and rail safety experts are looking at how the weight and movements of oil trains may be causing higher than expected track failures." Increasing rail traffic statewide would significantly exceed system capacity on almost all segments of rail in Washington. Whether or not the Union Pacific derailment was caused by track failure, here is just one reason among the many to strongly support preventing the largest coal export terminal in North America from ever becoming a reality.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the pubiic hearings/open houses
- Mail this compieted comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☒ Coal Dust
- ☐ Greenhouse Gas
- ☐ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

My concern is the Coal Dust that will be deposited along the rail route, and the migration of that coal dust into the adjacent environment. Natural processes, wildlife and human activity will cause this coal dust migration. Subsequently, the coal dust and it's contaminates will make it's way into the organisms, including humans.

Anthony Tobin, Cheney, WA 99004

(additional space is provided on the back)

(comment continued)

Todd, Roxane (2552)

Submission Number: ***MBTL-SEPA-DEIS-0002552***

Received: 6/12/2016 4:36:23 PM
Commenter: Roxane Todd
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
We need to support the coal industry and the miners.

Submission Number: ***MBTL-SEPA-DEIS-0001059***

Received: 5/24/2016 6:45:48 PM
Commenter: Stephani Todd
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn't have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. There might not be many who know how much coal is used in everyday occurrences, but for those who do, know Millennium's project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both. Thanks for reading my comments.

Submission Number: ***MBTL-SEPA-DEIS-0001991***

Received: 6/6/2016 2:42:42 PM
Commenter: Damon Toivonen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I add my name to the long list of area residents that support the rapid approval of a coal export facility in Cowlitz County. With the implementation of extensive environmental protection measures, the only effect that will be felt by the area is a positive one- increased tax revenues, increased construction employment, stable long-term jobs, and another reason to put the area on the map as an important center for trade concerns. Do not disappoint the people, please expedite the approval and permitting of this important development!

Tokarczyk, Linda (3379)

Submission Number: ***MBTL-SEPA-DEIS-0003379***

Received: 6/13/2016 11:44:06 PM
Commenter: Linda Tokarczyk
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Thank you for this opportunity to submit comment on the SEPA Draft Environmental Impact Statement (EIS) for Millennium Bulk Terminals-Longview, LLC proposed project for a marine terminal for export of coal in Cowlitz County, WA. I support the proposed action and want to see Wyoming coal available in international markets. I believe the draft EIS covers well the three main project objectives to be accomplished and does a good job of analyzing the potential impacts and proposing sufficient mitigation to reduce impacts. Thank you! Linda L. Tokarczyk

Submission Number: ***MBTL-SEPA-DEIS-0001990***

Received: 6/6/2016 2:41:43 PM
Commenter: Damian Tollefson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough now it is time to move forward with a fair process for permitting. We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage?

Submission Number: ***MBTL-SEPA-DEIS-0003281***

Received: 6/13/2016 7:39:38 PM
Commenter: Mateo Tome
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0000923***

Received: 5/24/2016 5:12:42 PM
Commenter: Diana Tomlinson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. I support Millennium Bulk Terminals site in Cowlitz County. These trains are no different than the coal cars we've transported through our state for many decades. In reality, not one ton more of coal will be used globally because of U.S. exports, and the net gain in greenhouse gas emissions is insignificant. If we don't build these terminals, energy suppliers will just look elsewhere for their supply! It is important that the public have the ability to comment on projects of this nature as the affects will last for years to come. Thank you for the opportunity to comment and please see that this project is worthy and should be allowed progress forward and develop.

Submission Number: ***MBTL-SEPA-DEIS-0002229***

Received: 6/7/2016 7:47:59 PM
Commenter: Edith Toney
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. Cowlitz County is fraught with uncertainty. Millennium’s proposal, however, offers all the economic benefits of a long-term port facility without any of the uncertainty. Coal is needed by other countries to help shape their future and enhance their quality of life. Let's give other countries the living standards we have for ourselves.

Submission Number: ***MBTL-SEPA-DEIS-0001074***

Received: 5/24/2016 6:55:57 PM
Commenter: Robert Toney
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the opportunity to weigh in on this development project in Longview. Please commit to a timetable for the issuance of a final EIS. Ecology's SEPA Rules require a final EIS to be issued as close as possible

Submission Number: ***MBTL-SEPA-DEIS-0001796***

Received: 6/2/2016 5:12:30 PM
Commenter: Dave Tongate
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold’s site. They are an important part of our community and economy and will do even more great work once their permits are granted. I can't think of one good reason why this port shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Tonozzi, Tay (0440)

Submission Number: ***MBTL-SEPA-DEIS-0000440***

Received: 5/17/2016 7:01:16 PM
Commenter: Tay Tonozzi
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life.

Submission Number: ***MBTL-SEPA-DEIS-0002381***

Received: 6/9/2016 6:01:24 PM
Commenter: Tay Tonozzi
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. Cowlitz County has a chronically high unemployment rate. There are environmental impacts of building trades and longshore workers having to travel as far as the Port of Seattle for work on a daily basis, instead of going to a job at Millennium. Let’s keep our jobs local! Enough with the schedule delays, bring this process to a close.

Submission Number: ***MBTL-SEPA-DEIS-0000164***

Received: 5/9/2016 1:58:30 PM
Commenter: James Topliss
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for this opportunity to voice my support of Millennium Bulk Terminals - Longview project. This port will benefit the economy of the region, and that of the nation. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. I sincerely appreciate the opportunity to submit these comments on the Draft EIS. Let's get this project moving forward so there are more good-paying jobs in the U.S.A.

Submission Number: ***MBTL-SEPA-DEIS-0003244***

Received: 6/13/2016 7:08:06 PM
Commenter: Arkell Torp
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter

Submission Number: ***MBTL-SEPA-DEIS-0002146***

Received: 6/7/2016 6:34:44 PM
Commenter: Jamie Torske
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Moving this project forward is important to me, my family and my community. Cowlitz County has a chronically high unemployment rate. There are environmental impacts of building trades and longshore workers having to travel as far as the Port of Seattle for work on a daily basis, instead of going to a job at Millennium. Let’s keep our jobs local! Thank you for letting me submit my opinions and show my support for the project.

Submission Number: ***MBTL-SEPA-DEIS-0000365***

Received: 5/13/2016 7:45:11 PM
Commenter: Tracy
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

In your DEIS, you state that the impact of burning fossil fuels, even in Asia, is harmful to the global environment. You also state that this coal COULD replace other coal sources. You are kidding yourself if you think that it will replace anything. If it's dug up out of the ground, it will get used at some point. It only increases the amount of coal available which extends the length of time that coal is being used. If you are dealing with an alcoholic, do you assume that it would be good to buy him a case of beer from store A because it COULD replace the beer he was drinking from store B or C? Trust me; he's drinking ALL the beer he can get his hands on because he has an addiction. We are seriously addicted to fossil fuels. By supplying more fossil fuels, you are feeding that addiction. I don't know how much more clearly I can explain it. This addiction is killing us. We are at an advantage here in western Washington. We currently have abundant annual rainfall and are far enough above sea level to be protected from rising seas. But we had a tornado touch down near my kids' school in December. We have longer, hotter summers. We are having forest fires destroy wild lands (which are carbon sinks) and people's property. Our salmon runs are in danger from increased temperatures -- I'm sure that much coal dust will do lots of damage too. But think about how you would feel if your family home was in a Pacific island and you watch as high tide storms encroach on your doorstep. Where do you move? You will lose everything. Or what if you lived in east Africa, and the plains around you were now dust because of alternating droughts and floods? You would have no way to grow food or graze livestock. How many people benefit from this facility? If you are talking about jobs, what about all of the firefighters that have to battle blazes as the western states burn because of drought? Are those the kind of jobs you want to bring to our region? How about the jobs that are lost in the fishing industries because of warming waters and ocean acidification (did you know that the ocean is 30% more acidic now? CO2 plus seawater equals an acid!)? You might feel like this one little terminal doesn't matter, but voting in favor of this project is voting in favor of buying that alcoholic a semi loaded with beer. It does matter. Every train loaded with coal matters. Your decision is impactful, and my kids will be dealing with those impacts long after you and I are gone.

Submission Number: ***TRANS-LV-Q1-00017***

Received: 5/24/2016 12:00:00 AM
Commenter: Julie Tran
Organization: Washington Environmental Council
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Julie Tran. I'm with the Washington Environmental Council. I got the internship there and I majored in environmental science. I notice that in school we learned that carbon is bad for the environment and there's a direct correlation between climate change and the increase in carbon emissions from human activities. I think this coal terminal is very unprogressive. It's sending us back to the industrial age. We are in 2016, the 21st century. We are not in the industrial age using steam engines. We're trying to move forward with clean energy. There is better technology out there. I grew up near a freeway, and I have asthma from it, and that's just a freeway, it's not a coal train railroad carrying coal trains. So just every day a lot of people live by the freeways. It's more common than living by a railroad but, just by that, I have asthma, and I believe that people have a right to live healthily and have a right to clean air and a right to live where they want in a healthy way knowing that their children will grow up healthy, their grandchildren will grow up healthy and I want to leave this Earth in the best condition, maybe even better than we found it, for our children and grandchildren and so forth. If carbon was supposed to be in the air, it would already be in the air. We don't need to put more of it in the air, and it's in the ground for a reason. It's finite, so I believe we should go for cleaner energy. Even if Longview needs jobs, they shouldn't move toward coal, they should move toward cleaner energy. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0000420***

Received: 5/17/2016 6:40:19 PM
Commenter: Twyla Tranfaglia
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Millennium Bulk Terminals has proposed a coal export terminal at Longview that is both environmentally-sound and economically beneficial. I ask that you approve this project and the environmental study without delay. Please commit to a timetable for the issuance of a final EIS. Ecology’s SEPA Rules require a final EIS to be issued, as close as possibleâ€

Submission Number: ***MBTL-SEPA-DEIS-0000957***

Received: 5/24/2016 5:33:22 PM
Commenter: Randy Traver
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

lease include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. The economy depends on trade. It creates jobs working the railroads and ships, loading cargo at the ports, growing crops for export, and building the infrastructure necessary to support a trade-based economy. However, trade depends on permitting approval to construct this infrastructure. If the federal, state, or local government apply different permitting standards to projects exporting coal, they are creating a dangerous precedent that will make it hard to build new infrastructure needed to export other goods, like wheat or manufactured products. The environmental groups have a long history of challenging trade based projects in the northwest, such as Columbia river dredging, new rail facilities and/or export terminals. Governments shouldn’t threaten trade or the jobs that depend on it. Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Submission Number: ***MBTL-SEPA-DEIS-0001637***

Received: 5/31/2016 6:08:01 PM
Commenter: Travis
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. MBT has received a thorough and comprehensive draft EIS review one five years in the making. If we don’t take the next step forward and turn this vision into a reality, it’s going to be citizens like myself and my family suffering the consequences. Our state desperately needs the jobs and revenue this project would create. That is why we must take the next step forward with MBT and move it from vision to reality. Thank you for listening.

Submission Number: ***MBTL-SEPA-DEIS-0003297***

Received: 6/13/2016 8:05:16 PM
Commenter: Carolyn Treadway
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

If life as we know it on Planet Earth is to be preserved, all fossil fuels must remain IN THE GROUND. This includes all coal bound for a purported marine shipping terminal in Longview. We do NOT need further destruction of the planet, nor to pollute our environment to ship coal elsewhere. Deny this permit immediately and forever.

Submission Number: ***MBTL-SEPA-DEIS-0003324***

Received: 6/13/2016 8:41:43 PM
Commenter: Roy Treadway
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please deny this permit for the marine terminal for export of coal in Cowlitz County, Washington. We do not need any dirty, polluting coal coming through this area NOR any coal being sent for export to else where in the world where it will be burned, thus contributing to climate change and global warming. Please keep the coal in the ground for the safety, welfare, and health of all. Thank you. Roy C. Treadway

Submission Number: ***TRANS-SPOKANE-M2-00006***

Received: 5/26/2016 12:00:00 AM
Commenter: Steve Tribbs
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. I'm Steve Tribbs (phonetic), and I live in the city of Spokane. Thank you for all the work that you've done, the technical material, and thank everybody in the office for participating in this hearing process.

Five years seems like it's a bit long for a corporation to wait for approval. I'd recommend approval as quickly as we can to get the jobs back into Washington state and also Wyoming and Montana. It's a regional problem with jobs fleeing rather than retaining or building. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0001199***

Received: 5/26/2016 11:46:48 AM
Commenter: Jill Trick
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My husband, John Anderson, and I have been forest landowners (18 acres) since 1985. In 30 years of managing our forest, we have observed a gradual increase in average temperatures. In the last few years we have experienced record-breaking windstorms, drought, and heat that have had a devastating effect on our 18 acres of trees. We are extremely concerned that climate change be addressed immediately. We have been following news of global trends in use of renewable energy and see that it is increasing exponentially. Given the present and future likelihood of a decline in use of coal and oil, we think this port is not worth the consequences. We also have personal concerns beyond climate change. We live on a peninsula on Lake Pend oreille. There are 3 access roads, all of which go over, under, or across the train track these coal trains use. We are very concerned about the additional train traffic with more noise, blowing coal dust, and potential serious accidents. We are also concerned that these uncovered coal cars are polluting important water resources. There is also the danger of derailment along these waterways.

Submission Number: ***MBTL-SEPA-DEIS-0000039***

Received: 5/2/2016 6:21:44 PM
Commenter: Liz Trojan
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Just say "No" to coal! We don't want to export it. We don't want to import it. Coal may be the cheapest form of energy but it is also by far the dirtiest. Coal trains passing through our cities harms our communities especially the health and well being of our youngest inhabitants. Coal trains passing through our rural and marine environments harms fish and wildlife. Exported coal contributes to global warming. The coal industry cannot mitigate the damage that it creates. We cannot afford to have coal exporters at our doorstep. Just say "No"!

Submission Number: ***MBTL-SEPA-DEIS-0001981***

Received: 6/6/2016 2:33:33 PM
Commenter: Tim Tromble
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. Our region is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal will help our recovery. Thank you for beginning the scoping process.

Submission Number: ***MBTL-SEPA-DEIS-0001527***

Received: 5/31/2016 4:47:37 PM
Commenter: Christopher Trujillo
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The draft environmental study for Millennium Bulk Terminals coal export facility was sufficient. Please move forward. There are many benefits of the project that the community is waiting for. Millennium is improving our local environment by cleaning up an industrial site. I support their plans to redevelop the site into a world-class terminal. The project will create much-needed construction and operation jobs, greatly benefit the local economy, and contribute to Washington State's role in international trade. The project proposal includes safeguards for the environment that will protect us, our children and grandchildren. Over $12 million has been spent by the County and Ecology on consultants to study the Millennium proposal, and this is money that could be better spent in our local community. It is time to bring the permitting process to a close and make a decision. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium's proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0001617***

Received: 5/31/2016 5:52:24 PM
Commenter: Lance Trujillo
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing today to express my support for the Millennium Bulk Terminals project in Longview. I am glad for the opportunity to voice my support of this important project. What most folks in Seattle tend to forget is that not everyone in Washington lives in Puget Sound. Not all of us work in the high-tech industry, and we still earn good livings as farmers, working at ports or in manufacturing. We make things, harvest and develop natural resources, feed our community and help facilitate trade in our great state. And we need more jobs like this especially in Cowlitz County where our unemployment rate is 8 percent. Millennium Bulk Terminals can bring great jobs to our county not to mention the much-needed tax revenues. Let’s not forget about how much time, effort and money Millennium has spent to clean up the port. Frankly, it was an environmental blight on our community, but now it will be a critical link for expanding trade for Southwest Washington. Again, having good jobs and protecting the environment can go hand in hand. I greatly appreciate you considering my input.

Submission Number: ***MBTL-SEPA-DEIS-0003305***

Received: 6/13/2016 8:12:18 PM
Commenter: Emily Trunbull
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Truppe, Eric (0924)

Submission Number: ***MBTL-SEPA-DEIS-0000924***

Received: 5/24/2016 5:13:11 PM
Commenter: Eric Truppe
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. Please reach out with any questions.

Submission Number: ***MBTL-SEPA-DEIS-0000524***

Received: 5/19/2016 5:28:20 PM
Commenter: Trueman Tryhus
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Unlike many port operations, Millennium occupies a location without immediate residential neighborhoods, AND it is an existing brownfield site. It should be understood that alternate locations do not exist for situating an export coal facility with the necessary water and rail access without gentrification impacts

Submission Number: ***TRANS-LV-M1-00030***

Received: 5/24/2016 12:00:00 AM
Commenter: Theodora Tsongas
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. I'm Dr. Theodora Tsongas. I'm an environmental health scientist formerly with the Oregon Health Division and formerly assistant professor of Environmental Science at Washington State University and adjunct associate professor of Community Health at Portland State University. I'm also a member of Multnomah County Local Emergency Planning Committee and serve on the Environmental Health Work Group of Oregon Physicians for Social Responsibility. Thank you for disclosing some of the significant adverse and unavoidable impacts of this project. There is sufficient evidence in the DEIS to support your choice of the no action alternative. However, the DEIS fails by minimizing health impacts. The health and environmental risks defined in the DEIS present unavoidable and significant adverse impacts in Longview, Washington state, and communities across the Northwest. The suggestions for mitigation are inadequate and largely depend on measurements of contamination after exposures to hazardous materials, physical agents or situations have occurred. The mitigation proposed is inadequate in that significant health impacts will already have been experienced. Short term and intermittent exposures are not given appropriate consideration. No real attempt is made on the part of the applicant to prevent exposures resulting from it's projected activities. It can therefore be predicted that adverse health impacts will result from this project. Although the DEIS described risks to communities, it minimizes them and does not examine or predict with data the potential real risks resulting from its proposed actions. Therefore, I ask a formal health impact assessment be conducted with public review and be included in the final EIS. If this cannot be done then the project should be rejected and the no action alternative adopted. We can instead find sustainable alternatives that do not sacrifice communities but provide good long-term jobs and economically viable solutions for the whole community. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001742***

Received: 6/1/2016 11:59:47 PM
Commenter: Toyoko Tsukuda
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

To WA Ecology Department and Cowlitz County, Thank you for conducting an environmental impact study on the Longview coal terminal project. As a Washingtonian, I am fortunate to have the state and local agencies taking the citizens' concerns seriously and embarked on studying the impact of the coal terminal project. The Environmental Impact Study (EIS) showed that the construction of the coal terminal at Longview and the high volume of coal transport by trains and vessels have a significant impact on environment and the lives of people in the studied area. My question is what is the economic impact on Washingtonians? The company's analysis showed that the benefit of the project will be to create permanent 135 jobs in Cowlitz County and annual $2.18 million & $1.45 million tax revenue to Cowlitz County and WA respectively. They estimated the cost of building the port to be $638 million (Economic & Fiscal Impact Analysis Of Millennium Bulk Terminals Longview, BERK Consulting, Apr 12, 2012). However we have not seen the analysis on the cost that Washingtonians pay in terms of health cost, loss of work hours due to delays in traffic, loss of revenue from fishing, loss of habitat and wetland due to the establishment of the coal terminal etc. The EIS showed that the estimated air quality would be above the NOAA standard and coal dust would be above the trigger levels (New Zealand Ministry of Environment 2001) within 100 feet of coal train runs. I assume that the coal dust data in the EIS were derived after considering the coal dust reduction treatment. The New Zealand study emphasized that for the sensitive area (residential area), the trigger level should be lower than that listed in the EIS (EIS, Chap 6, Table 6-22). Coal dust doesn't stop at 100 feet but goes beyond. The Tri-Cities area is known as the windy cities. Accumulated coal dust would be dispersed by the wind. The problem is that the train tracks run through the vicinity of residential and school zones in Kennewick and Pasco. I have been asthmatic due to allergies but it hasn't been a big problem until the severe forest fire in WA last year. A couple weeks of bad air quality in Tri-Cities from the fire activated my asthma and now I have persistent asthma. The bad air quality triggers asthma to sensitive people. What would happens to the residents and school children who are chronically exposed to coal dust and contaminated air? "Ambre Energy North America and Arch Coal, which have publicly put costs to develop the terminal at over $650 million, an estimate that low-balls the real number. It doesn't count mitigation of community traffic, safety, environmental and health impacts that would likely be required if the port is built. Just one of those expenses—remediation of potential gridlock in and around Longview caused by coal-train traffic—has been estimated at $150 to $200 million." (Ross Macfarlane, Institute for Energy Economics and Financial Analysis, http://ieefa.org/in-northwest-u-s-desperate-times-for-u-s-coal-mean-desperate-port-proposals/) So it is imperative for us to know whether the benefit we get from the coal terminal outweighs the actual cost that many Washingtonians will end up paying yearly. Toyoko Tsukuda, Ph. D. Richland, WA

Submission Number: ***TRANS-PASCO-Q2-00001***

Received: 6/2/2016 12:00:00 AM
Commenter: Toyoko Tsukuda
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Toyoko Tsukuda, Ph.D., and this is public comment on Longview Coal Terminal, June 2, 2016.

To Washington Ecology Department and Cowlitz County.

Thank you for conducting an environmental impact study on the Longview coal terminal project. As a Washingtonian, I am fortunate to have the state and local agencies taking the citizens' concerns seriously and embarked on studying the impact of the coal terminal project.

The Environmental Impact Statement (EIS) showed that construction of the coal terminal at Longview and the high volume of coal transport by trains and vessels have significant impact on environment and the lives of the people in the studied area. My question is what is the economic impact on Washingtonians?

The company's analysis showed that the benefit of the project will be to create permanent 135 jobs in Cowlitz County and annual 2.18 million dollars and 1.45 million tax revenue to Cowlitz County and Washington respectively. They estimated the cost of building the port to be 638 million dollars. (Economic and Fiscal Impact Analysis of Millennium Bulk Terminals Longview, BERK Consulting, April 12, 2012.)

However, we have not seen analysis on the cost that Washingtonians pay in terms of health cost, loss of work hours due to delays in traffic, loss of revenue from fishing, loss of habitat and wetland due to the establishment of the coal terminal, et cetera.

The EIS showed that the estimated air quality would be above NAAQS standard and coal dust would be above the trigger levels (New Zealand Ministry of Environment 2001) within 100 feet of coal train runs. I assume that the coal dust data in the EIS were derived after considering the coal dust reduction treatment. The New Zealand study emphasized that for the sensitive area (residential area), the trigger level should be lower than that listed in the EIS (EIS, chapter 6, table 6-22).

Coal dust doesn't stop at 100 feet but goes beyond. The Tri-Cities area is known as the windy cities. Accumulated coal dust would be dispersed by the wind. The problem is that the train tracks run through the vicinity of residential and

schools zones in Kennewick and Pa

I have been asthmatic due to allergies but it hasn't been a big problem until the severe forest fire in Washington last year. A couple of weeks of bad air quality in Tri-Cities from the fire activated my asthma and now I have persistent asthma. The bad air quality triggers asthma to sensitive people. What would happen to the residents and school children who are chronically exposed to coal dust and contaminated air?

Quote, Ambre Energy North America and Arch Coal, which have publicly put cost to develop the terminal at over 650 million, an estimate that low-balls the real number. It doesn't count mitigation of community traffic, safety, environmental, and health impacts that would likely be required if the port is built. Just one of those expenses-remediation of potential gridlock in and around Longview caused by coal train traffic has been estimated at 150 to 200 million, end quote. (Ross Macfarlane, Institute for Energy Economics and Financial Analysis, http://ieefa.org/in-northwest-u-s-desperate-times-for- u-s-coal-mean-desperate-port-proposals/)

So it is imperative for us to know the benefits we get from the coal terminal outweighs the actual cost that many Washingtonians will end up paying yearly. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002608***

Received: 6/13/2016 11:27:05 AM
Commenter: Robert Turnbull
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***TRANS-LV-M1-00069***

Received: 5/24/2016 12:00:00 AM
Commenter: Dr. Ann Turner
Organization: Virginia Garcia Memorial Health Center, Medical Director
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. Thank you for the opportunity to comment. My name is Dr. Ann Turner, and I've worked since 1972 to provide health care for low income families. And for the past more than 20 years I've worked at Virginia Garcia Memorial Health Center as a provider and medical director. I've been active in regional organizations like the Northwest Primary Care Association. That includes Idaho and Washington. I'm here today to ask that you consider the significant issue of environmental justice and select the no action alternative. It's important to understand the full scope of the negative impacts of this project that will com to low income and minority communities. The Draft Environmental Impact Statement makes it abundantly clear that there will be significant impacts to low income communities. Air quality will be degraded by diesel emissions, coal dust will coat homes and playgrounds. As others have said, emergency response times will be delayed. And also loud startling train horns running 24/7 will disrupt the sleep of those living in the Highlands area and in other low income neighborhoods along the entire rail corridor. Serious health impacts from increased hospitalizations for asthma, heart attacks, and cancers will be experienced by those already over burdened by exposure to industrial and diesel pollution. These are impacts that cannot be avoided or mitigated. Precious resources have been committed to improving the health of the Highlands and other low income neighborhoods. Shall we move backwards or forwards? Will our decision support or damage the health of children and families? Today we don't have the benefit of a high quality comprehensive health impact assessment, but I believe that when we do we'll have an even stronger case against this measure.

Submission Number: ***MBTL-SEPA-DEIS-0002439***

Received: 6/10/2016 1:48:36 AM
Commenter: Christine Turner
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's nieve to think that the coal dust will stay 50ft next to the tracks. The high winds, rain will disperse it to our homes and rivers. Require use of a biodegradable surfactant. Statistics from australia, cars not same size, loaded differently, surfactant not same, weather differences etc. Don't compare to wa. Even our weather has changed last 10 years record rains excessive drought conditions. When results were over acceptable limits. They tried to explain it away by saying weather was unusual. Second spray of surfactant is not required. Not all trains go thru pasco wa. More rail accidents from 50.43 to 61.81 in 2028 just in wa. Adverse cumulative impacts. Can't list all, but what a list. Air quality Shoreline use Hazardous materials surface water wetlands coal dust rail safety vessel safety greenhouse emmissions. Coal markets are declining. Even the rail companies don't want to ship the coal as its degrading the tracks. The trains blocking roadways from the origin of the coal to longview is unacceptable. The counties and communities shouldnt have to pay for bridges. Sone situations cannot be mitigated. Energency services will be effected all along the route. The no action alternative is just as destructive with more exporting of hazardous materials. Chose another alternative. The mosier oil train derailment was another example of transporting fossil fuels. The distance these trains have to travel and the communities that they travel thru is just too long. Please do not accept this proposal that damages our health and our precious resources.

Submission Number: ***MBTL-SEPA-DEIS-0001874***

Received: 6/2/2016 6:22:51 PM
Commenter: Fredric Turner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I fully support the creation of Jobs in the Longview Kelso area. This job would be an asset not only to the working class but to the city in taxes and revenue.I appreciate the agencies offering this opportunity to comment on Millennium Bulk Terminals DEIS. The port at Longview will bring many good paying jobs to Washington and will encourage the development of our natural resources nationwide, helping to lift us out of our current nationwide economic depression. This draft EIS is exhaustive and quite frankly, overreaching. For instance, because the proposal is a terminal proposal, the use of the bulk commodity by a third party is a superseding and intervening cause to the combustion of coal. As a result of these superseding causes, the construction and operation of the terminal is not a proximate cause of the combustion of coal. Enough already! The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward.

Submission Number: ***MBTL-SEPA-DEIS-0000453***

Received: 5/17/2016 7:22:15 PM
Commenter: George Turner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it’s time to move forward. Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Turner, Ron (0954)

Submission Number: ***MBTL-SEPA-DEIS-0000954***

Received: 5/24/2016 5:31:59 PM
Commenter: Ron Turner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The Department of Ecology should speedily complete the permitting for Millennium Bulk Terminals. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let's be clear the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. Thank you for accepting comments for this important project. Please make the necessary steps to move forward on its approval as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0002307***

Received: 6/9/2016 5:06:06 PM
Commenter: Bill Tuss
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on the DEIS of the proposed Cowlitz County coal export terminal. This is an excellent project and one that will bring broad-ranging economic benefits to Washington and to the national economic outlook for years to come. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Submission Number: ***TRANS-LV-Q3-00036***

Received: 5/24/2016 12:00:00 AM
Commenter: Zubaida Ula
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Zubaida Ula, Z-U-B-A-I-D-A, last name U-L-A. And I live down the road in La Center, Washington.

And like everybody else I'm very busy. I have three little kids and I work as a real estate agent and I home school my kids. But my friend Tracy told me about this issue of a coal terminal here in Longview.

She sent me an email where she calculated the coal dust, just the one little aspect of this, and she calculated it all up, and the numbers are really crazy.

Even using the BNSF's own numbers, that they would spray surfactants and cut the coal dust loss down by 85 percent, it still would be 645 tons of coal lost over 400 miles. Well that's if surfactants aren't applied.

I'm sorry, it's a lot of numbers and it's a lot of coal dust. And I think of these trains going through the windy Columbia River Gorge and the soil contamination, the watersheds, the communities along the route, I think it's just a terrible idea.

And I actually grew up in Wyoming, that's my home state and that's where the coal comes from, and this is not a sustainable industry. We need to leave it behind. And Longview shouldn't be a place where we build something for a dying industry.

So I really hope that that does not happen and that Longview says no to this coal train. Thank you.

Submission Number: ***TRANS-LV-M1-00053***

Received: 5/24/2016 12:00:00 AM
Commenter: Justin Jacobs
Organization: Union Pacific Railroad
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. My name is Justin Jacobs, and I represent Union Pacific Railroad. Union Pacific fully supports the Millennium Bulk Terminal Project which will bring jobs to the region while providing a positive economic impact. Coal continues to be an important low cost source of electricity and a key part of the world's energy equation. As a rail transportation company we transport all materials in accordance with federal law, industry standards, and other operating rules to safely and efficiently move freight. Furthermore, we are regulated by a number of agencies at all levels of government. Union Pacific currently transports coal on behalf of our customers through thousands of communities across our 23-state network. We have safely transported coal throughout the western coast. Protecting the environment and the communities we serve is a guiding principle at Union Pacific, whether it is by increased fuel efficiency, reducing air emissions and energy consumption, and recycling used materials. As a company we are dedicated to being good stewards of the environment and good partners. Our primary focus is safety and efficiency. We inspect our track regularly and invest heavily to enhance our infrastructure. Additionally, we proactively work with the communities where we operate trains. We have strong relationships with those communities that we serve across our network and will continue meeting with them to maintain a constructive exchange about our presence in the community. We will continue to safely ship coal and many other commodities in partnership with these communities throughout the western pacific. Thank you for the opportunity to make these comments.

Submission Number: ***TRANS-PASCO-M1-00008***

Received: 6/2/2016 12:00:00 AM
Commenter: Mike Glass
Organization: Union Pacific Railroad, Director of Oregon and Washington Public Affairs
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Greetings. I'm Mike Glass (phonetic). I'm the director of Oregon and Washington public affairs for Union Pacific Railroad. I just want to make a statement the Union Pacific strongly supports the Millennium Bulk Terminal which will bring badly needed jobs to the region and providing positive economic impacts.

Coal continues to be important low-cost source of energy and a key part of the world's energy equation. As a rail transportation company, we transport all materials in accordance to federal law, industry standards and other operating rules to safely and efficiently move freight.

Furthermore, we're regulated by a number of agencies at all levels of government. Union Pacific transports coal on behalf of our customers throughout thousands of communities around our 23-state network. We have safely transported millions of tons of coal throughout the Northwest along with the rest of the rail industry. The majority of the coal we transport throughout the West Coast originating in Colorado and Utah.

Protecting the environment and the communities we serve are the guiding principles whether it's increasing fuel efficiency, reducing air emissions and guarantying consumption or recycling used materials. We are dedicated to being good stewards of the environment and good partners.

Our primary focus is safety and efficiency. We inspect our track regularly and we work to protect our entire infrastructure. We will continue to safely ship coal and other commodities in partnership with the communities we serve where we operate trains throughout the Pacific Northwest.

Thank you for the opportunity to make these comments. And once again, I want to reiterate our strong support for this project which we feel meets all standards and should be approved.

Thank you.

Submission Number: ***TRANS-SPOKANE-M1-00025***

Received: 5/26/2016 12:00:00 AM
Commenter: Tom Parker
Organization: Union Pacific Railroad
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

SPEAKER 25: Good afternoon. My name is Tom Parker, and I'm here today on behalf of Union Pacific Railroad.

Union Pacific fully supports the Millennium Bulk Terminal project which will bring jobs to the region, will provide a positive economic impact. Coal continues to be an important low-cost source of electricity and a key part of the world's energy equation.

As a rail transportation company, we transport all materials according to federal law, industry standards, and other operating rules to safely and efficiently move freight. Furthermore, we are regulated by a number of agencies at all levels of government.

Union Pacific currently transports coal on behalf of our customers to thousands of communities around our 23 state network. We have safely transported millions of tons of coal throughout the western United States. The majority of coal we transport throughout the west coast originates in Colorado and Utah.

Protecting the environment and the communities we serve are guiding principles at Union Pacific whether it's by increasing fuel efficiency, reducing air emissions, energy consumption, or recycling used materials. As a company, we're dedicated to being good stewards to the environment and good partners. Our primary focus of Union Pacific is safety and efficiency. We inspect our tracks regularly, invest heavily to enhance our infrastructure.

Additionally, Union Pacific works proactively with the communities where we operate trains. We have strong relations with the communities we serve across our network and we plan to continue meeting with those communities to maintain a constructive exchange about our presence in the community.

We will continue to safely ship coal and many other commodities in partnership with communities where we operate trains throughout the Pacific Northwest. Thank you for the opportunity to appear before you this afternoon.

Submission Number: ***MBTL-SEPA-DEIS-0002954***

Received: 6/13/2016 3:30:34 PM
Commenter: David Unruh
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. It's time to support our agricultural industry and move this project forward. Let's quit talking and take action now! thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002759***

Received: 6/13/2016 2:12:47 PM
Commenter: Jeremy Unruh
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***TRANS-LV-Q1-00020***

Received: 5/24/2016 12:00:00 AM
Commenter: Sabrina Upadhyay
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Sabrina Upadhyay. I'm a 23-year-old woman of color, and I live in Seattle, Washington, but I've traveled a lot growing up and have lived in Geneva, Switzerland and Katmandu, Nepal and in Manila, Phillipines, and what I do know is that this terminal is part of a larger global picture. As a global citizen, I feel like it is important for us to have an alternative to this terminal because it is people's life at stake and not only lives in Washington State but lives all around the world. And, time and time again, we've seen that the impact of climate change disproportionately impacts communities of color and lower income communities. And so having this terminal not be carried out is a way for us to act on social justice principles and equity principles and to stop communities from not having a voice. Here in Washington State, we have the choice and privilege to make this choice and a lot of the impacts that will come from this will have larger impacts greater than what's in our front door. Those immediate local impacts are also just as important, and we also see it locally. Lower income communities and communities of color here in Washington State also get disproportionately impacted so, yeah.

Submission Number: ***MBTL-SEPA-DEIS-0001614***

Received: 5/31/2016 5:50:27 PM
Commenter: Randy Upton
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our economy and our families are suffering. We can do something about this by supporting the proposed port at Longview that will put people to work quickly and will keep them gainfully employed for years to come. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough â€" now it is time to move forward with a fair process for permitting. Thank you for accepting comments for this important proposal. The Millennium project will do a great deal for the economic outlook of this country. Let's get Americans back to work!

Submission Number: ***MBTL-SEPA-DEIS-0001937***

Received: 6/6/2016 1:54:18 PM
Commenter: Francisco Uribe
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study should move forward in a timely manner. Please allow me to provide my comments in regards to the draft EIS. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium's proposal is unprecedented and has far reaching economic implications. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001946***

Received: 6/6/2016 2:00:28 PM
Commenter: Larry Uroszek
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Longview is a town built on natural resources and import/export. I believe this project is a perfect fit for our community. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays.

Submission Number: ***MBTL-SEPA-DEIS-0000058***

Received: 5/3/2016 3:00:15 PM
Commenter: John Urquidez
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Bring the never-ending studies and ever-expanding permitting costs to a close â€" and move on to a permit decision. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. Thank you for accepting comments for this important project. Please make the necessary steps to move forward on its approval as soon as possible. Sincerely, John Urquidez

Submission Number: ***MBTL-SEPA-DEIS-0003418***

Received: 6/14/2016 2:41:12 AM
Commenter: Edward Ury
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

RE: Chapter 5: Operations... In addition to the modeled impact for cumulative air quality from the proposed action, please include a total predicted concentration of criteria pollutants that also accounts for additional air pollutants from the projected increase in vessel traffic for 2028. Table 5.4-14 predicts an increase of large commercial vessels moving on the Columbia River in 2028 in the scenario of the No-Action-Alternative that amounts to roughly one-third of the increase from the proposed action. The predicted concentration of criteria pollutants resulting from the increased emissions of the project falls below the maximum allowed NAAQS. However, the EIS only includes the total of the estimated increase added onto the background level. The Final EIS should determine a Total Predicted Concentration that applies the same estimation for Vessel Traffic increases used in Chapter 5 to assess cumulative air quality impact compounded with background levels and a modeled impact for on-site and off-site operations. The AERMOD Modeling results (shown in Tables 7, 8, and 9 of Volume IIIc: Operations Technical Reports) indicate significant increases of air pollutants that approach the limits of the NAAQS. The Southwest Clean Air Agency should be able to consider if this project could result in on-site concentrations of criteria pollutants that could be reasonably foreseen to exceed the NAAQS by 2028. Thank you for reviewing these comments in order to improve upon the thorough review undertaken to better identify this significant project's myriad adverse impacts.

My name is Kenji Ushimaru from Infra Innovations of Seattle, and a member of Clean Tech Alliance of Washington. My professional area of expertise is in analysis of national energy policies, and their impact on global energy supply and demand.

I'd like to present some critical facts gleaned from the Draft Environmental Impact Statement and from my current research into Post-Tsunami national energy policies in Japan and the United States.

The basic tenet of the coal usage in the DEIS is that low-sulfur coal from Powder River Basin will be exported to Japan and South Korea.

The demand for energy in these countries is growing. After the tsunami event in 2011, Japan shut down all nuclear reactors, thereby losing 30% of electric base load. Japan plans to build 46 new coal plants, and Korea will be building 10 new plants in the 10 years. But more importantly they also intend to take responsibility for carbon reduction as both are signatories of the Paris Climate Accord.

Coal-fired plants in these countries have the highest efficiency and are cleanest in Asia, which is 24% better than plants in the US and 33% better than plants in China. Furthermore, Japan is already meeting the IEA Roadmap for carbon reduction, and is going beyond the roadmap by building Carbon Capture and Storage facilities.

Therefore, this project can clearly meet Washington's regulatory framework and should be permitted so that Washington's important trading partners can benefit from a stable supply of American coal, while furthering their commitment to carbon reduction technologies.

All the while the project will create jobs in Cowlitz County, resulting in a true win-win scenario for regional economic development and expanded partnership with two countries committed to serious carbon reductions.

Thank you for the opportunity to add my comments to this process.

Submission Number: ***MBTL-SEPA-DEIS-0002133***

Received: 6/7/2016 5:24:49 PM
Commenter: Joe Vaccari
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My comments pertain to the draft EIS for the Longview coal export facility. I hope you will give them good consideration. What most folks in Seattle tend to forget is that not everyone in Washington lives in Puget Sound. Not all of us work in the high-tech industry, and we still earn good livings as farmers, working at ports or in manufacturing. We make things, harvest and develop natural resources, feed our community and help facilitate trade in our great state. And we need more jobs like this, especially in Cowlitz County where our unemployment rate is 8 percent. Millennium Bulk Terminals can bring great jobs to our county, not to mention the much-needed tax revenues. Let’s not forget about how much time, effort and money Millennium has spent to clean up the port. Frankly, it was an environmental blight on our community, but now it will be a critical link for expanding trade for Southwest Washington. Again, having good jobs and protecting the environment can go hand in hand. Our region is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal will help our recovery. Thank you for beginning the scoping process.

June 12, 2016

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

Re: EIS Public Comment for Millennium Bulk Terminals – Longview coal export terminal

Washington State Department of Ecology:

As environmental scientists, we are providing our comments on the proposed Millennium Bulk Terminals – Longview coal export terminal. Lighthouse Resources Inc. is requesting to transport coal it (carbon-emitting and potentially combustible) through the Columbia River basin and to store it in Longview before shipment to East Asia.

Spills, Explosions, and Aquatic Ecosystem Impacts

The impact of a spill or explosion can have severe economic ramifications. If a vessel or train spill into the Columbia River, the environmental impacts would be extremely difficult to contain, given the strong water currents. Countless numbers and diversity of fish and wildlife live in this area and out into the Columbia River saltwater plume and Pacific Ocean. Salmon, seals, and whales are among the most revered. Visitors from all over the world come to fish for Pacific salmon and view the Pacific Flyway bird migrations in our National Wildlife Refuges (which provide resting and feeding areas). The effects of coal/dust release from train derailment or vessel spill would be widespread and long-lasting in aquatic, land, and aerial environments.

Hence, studies need to address the impacts to plant and animal species (e.g., birds, mammals, fishes, insects, lizards, amphibians, plants, and fungi). All threatened and endangered species in marine and freshwaters, on land, and in the air need to be thoroughly evaluated.

Other Environmental Resource Concerns

The Columbia River is the largest salmon river in the Pacific Northwest. Seasonality, indirect (e.g., food-web), and cumulative impacts should be included in the assessment, including wetland impacts.

Longview is located in tidal waters of the lower Columbia. Out-migrating juvenile salmonids use tidal-freshwater and estuarine habitats for feeding, rearing, and acclimation to saltwater. Returning adult salmon also use these habitats to acclimate to freshwater. Essential habitats for Pacific salmonids, sturgeons, lampreys, eulachon smelt, Pacific herring, and other marine fishes may be negatively impacted, so their food sources and spawning habitats should be evaluated for the Longview terminal project and connecting rail lines throughout the Columbia River basin (including Spokane).

Avian breeding, feeding, and roosting sites need to be assessed for potential impacts from noise, vibrations, and light during construction and operations. If pilings are installed, noise/vibration impacts to whales and other marine biota should be evaluated. Adverse effects on reproduction and migrations of birds and marine mammals are likely to occur and need to be studied.

Finally, the public needs to understand what types of environmental mitigation are being considered for each potential impact (direct, indirect, and cumulative).

Hydrology, Hydrography, Geology, and Contaminants
The Columbia River estuary includes mudflats and saltmarshes that are difficult to clean up in the event of a derailment or vessel spill. The unique hydrology and geology of the area combines in such a way that coal contaminants can spread rapidly and widely, especially during winter storms with strong winds, heavy rain, and spring tides. Full-seasonal hydrographic studies of marine currents along vessel routes need to be performed to determine potential suspended and benthic sediment contaminants, both within Columbia River and for the outer coast.

Freshwater resources, including sole-source aquifers, well-head protection zones, and groundwater tables, need to be assessed. Stormwater runoff and its potential impacts to groundwater and surface water conveyances should be evaluated, including saltwater impacts. Storage, plant operations, and maintenance and use of all hazardous substances to be used, generated, or processed from the site should be assessed.

The potential impacts from local geology should be included in the Environmental Impact Statement (EIS), including an assessment of geologic faults and tsunamis. Soil types should be studied to address potential impacts such as liquefaction.

Climate Change and Air Quality
Climate change impacts should be assessed for all potential rail and vessel transport areas in terrestrial and aquatic (freshwater/marine) environments. The study should also address greenhouse-gas impacts related to the burning of coal, both local and abroad. Other potential impacts such as increasing sea level and wetland inundation should also be fully evaluated.

Wind currents may bring contaminants from this burned coal back to western Washington. Volume, concentration, and types of compounds need to be assessed for effects to human health and biota.

Public Safety
Storage, processing, and potential derailment and vessel-spill impacts need to be evaluated, particularly given the aging railways in Washington state. We have already witnessed catastrophic impacts from the derailment of coal from the Bakken deposits, including infrastructural destruction, loss of life, and negative economic impacts. The rail line carrying the coal is close to Columbia River urban areas and busy highways. Because coal is combustible, derailment could cause an explosion that could kill and injure many people; no loss of life is acceptable. This could also cause major disruptions to commerce and recreational uses. Furthermore, “rapid response” really needs to be available immediately to minimize injury and loss of life.

Coal dust can cause significant air pollution that spreads toxins widely and can affect our ability to breathe. Because **i**ncreased coal dust will impact air quality, wind-current directionality and airborne contaminants need to be evaluated.

Social/Environmental Justice Assessment
The evaluation should assess minorities (e.g., tribal and eastern Washington Hispanic) and economically depressed communities in the Cowlitz and adjoining counties because they have few resources to deal with human/environmental calamities that could impact them. A noise/vibration study also needs to be conducted to determine the impacts to human residents, especially the poor.

Land Use and Traffic

Population growth and density need to be studied to assess whether increases align with the future needs to support infrastructure. Evaluations need to be performed to assess at-grade intersection rail crossings for traffic congestion and safety, and for emergency-vehicle access.

Concluding Remarks

The scope of this EIS should be comprehensive. Without further studies of real and potential impacts for each of the aforementioned disciplines, it is irresponsible for coal profits to be the priority for growth in Cowlitz County. And the fact that this county is economically depressed should not be driving the potential for public and environmental risk. Coal companies cannot readily provide adequate bonds to cover potential damages from derailments, vessel spills, and air pollution. Railroad and vessel companies have poor track records of providing adequate compensation for public and environmental damage. The overwhelming burden of recovery falls disproportionately on the public and government agencies.

Concerns

- Increased rail traffic will cause the tracks to deteriorate even more quickly.
- The frequency and thoroughness of inspections and maintenance of railroad tracks needs to be ramped up.
- Coal cars need to be covered, to minimize air and soil pollution.
- The safety and durability of the vessels should require double-hulled ships.
- Public safety and soil/air/water quality should not be compromised for coal-company profits.
- Millennium Bulk Terminals should be required to provide full bond coverage for potential emergencies from train/vessel crashes and natural disasters.
- Rapid-response equipment, manpower, and safety plans must be in place at all (inland/coastal) locations prior to the transport of coal.
- Most importantly, the coal industry is not economically viable and would contribute greatly to climate change overseas that would in turn impact us.

The Columbia River basin is enjoyed by many Washington citizens and visitors for their priceless and irreplaceable natural wonders. We strongly recommend that these areas be protected for today and posterity.

Washington state is rapidly moving away from fossil fuels towards clean, renewable sources to meet our energy needs and respond to global warming. Building more infrastructure for “dirty” fossil fuels does not support our state’s commitment to address climate-change impacts. We support our state’s continued efforts to be a leader in safe, renewable, clean-energy solutions.

A full EIS needs to be performed, because the risks are too high from environmental and human safety standpoints, including for generations to come. It is not a matter of IF a coal derailment/spill will occur in southwestern Washington, but WHEN. There should be no increase in the number of coal trains and vessels until questions and concerns are satisfactorily addressed.

Thank you for considering our comments.

Sincerely,

Dr. Robert L. Vadas, Jr. and Cynthia L. Stonick
Aquatic Ecologists

Submission Number: ***MBTL-SEPA-DEIS-0001405***

Received: 5/26/2016 7:49:06 PM
Commenter: Alex Valdez
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. In Longview, 56% of kids need free and reduced price lunch at schools and go home to neighborhoods facing 8% unemployment. We cannot afford to look the other way when projects in this area guarantee new jobs and private investment in our schools, roads, and local services. In fact, the estimated number of jobs related to construction activity at the Millennium Bulk Terminals project is 1,350 temporary direct jobs - that will mean $70 million in direct wages! When the project is completed there will be about 135 direct jobs and about 165 indirect jobs. These numbers simply cannot be ignored. Remember this project's economic benefits to the local community. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***TRANS-LV-M2-00067***

Received: 5/24/2016 12:00:00 AM
Commenter: Alisa Valdez
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hello. Good evening. My name is Alisa Valdez (phonetic). I am an immigrant from Mexico. I have called Vancouver and the Pacific Northwest my home for the past 15 years. I am here because I'm a witness of the desolation of the natural resources.

Growing up in a developing country, I witnessed firsthand the short-term devastation when transnational companies came in. In a period of five years we've seen forests destroyed, natural resources, and the health declining for our most vulnerable, our children and our seniors.

Most recently my daughter went on a field trip. And she was so excited telling me about a 70-year-old sturgeon named Herman. And I wish with God's help that my grandchildren could go to the river and say, Grandma, I saw a salmon, a huge salmon.

That's all I want for my community, for my kids, and for my family. And most importantly to breathe clean air and which this culture may know I know with all the coal dust, it will be terrible especially for our children.

Thank you very much. And I urge you not to build a coal terminal here in Longview.

Valo, Melissa (1750)

Submission Number: ***MBTL-SEPA-DEIS-0001750***

Received: 6/2/2016 11:52:36 AM
Commenter: Melissa Valo
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
We do not want more coal coming through our state or our ports. Period.

Submission Number: ***MBTL-SEPA-DEIS-0000264***

Received: 5/10/2016 6:23:14 PM
Commenter: Chris VanArsdale
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The draft environmental study for Millennium Bulk Terminals coal export facility was sufficient. Please move forward. There are many benefits of the project that the community is waiting for. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002384***

Received: 6/9/2016 6:02:58 PM
Commenter: Chris VanArsdale
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

VanBrocklin, Gil (3726)

Gil Van Brocklin
1711 Locust Rd
Spokane WA 99206
gvb3@comcast.net

I am very much opposed to the building of any new export facility on the Washington coast, or any coast for that matter. It is appalling to me that people are so short sighted to believe any thing but short term goals will be met. When in reality the long term destruction of our environment and the quality of life in Washington will far out weight the benefits.

I will not support any union who goes along with this project for whatever their justifications might be, they do not serve the people on earth and especially Washington state.

More

VanBrocklin, Gil (3726)

There are many more reasons to not proceed with the increase loads to our infastructure and its surrounding environments. Some of these are very delicate and cannot with stand much more impacts.

It is imperative the the short term needs of a few workers will be considered over the needs of the people who stand to gain nothing from this project.

I also will be watching and voting according to the way my "representatives" support this project

I stand firmly against any an all efforts to proceed.

Vote NO on short term gains and yes on long term wisdom

VanCleve, David (3785)

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☒ Greenhouse Gas
- ☒ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

It is morally wrong to allow new uses of coal because of the long term consquences of Green house gas and climate change. The coal must stay in the ground. the EIS must address the long term consgences of this. Please

David Van Cleve
Selah Washington

(additional space is provided on the back)

(comment continued)

Submission Number: ***MBTL-SEPA-DEIS-0002916***

Received: 6/13/2016 3:10:15 PM
Commenter: Susan VanDyk
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001620***

Received: 5/31/2016 5:53:38 PM
Commenter: Sharon VanGorder
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please move forward with the government’s environmental study. I say let's get moving with the Longview port ASAP. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn’t have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002185***

Received: 6/7/2016 7:05:23 PM
Commenter: Matthew VanHook
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please accept my comments on Millennium Bulk Terminals Longview DEIS. I approve of this project and would like to see its quick implementation. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let’s be clear â€" the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project â€" without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0000636***

Received: 5/20/2016 1:19:14 PM
Commenter: James VanHorn
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the opportunity to weigh in on this development project in Longview. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium's proposal. Now that the rail corridor has been studied, now it's time for progress on the Millennium project! So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0002316***

Received: 6/9/2016 5:13:18 PM
Commenter: Carol VanKeuren
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. Raising a family is tough, and this economy is not making it any easier. That’s why we need to capitalize on any opportunity that we have to provide good-paying jobs that can support a family. The Millennium Bulk Terminal project will create jobs that can help families give their children the head-start that they need. There are men and women throughout the state that are waiting for the chance to work hard for their families. It simply makes no sense to turn them away at this point. I greatly appreciate you considering my input.

Submission Number: ***MBTL-SEPA-DEIS-0000255***

Received: 5/10/2016 6:07:24 PM
Commenter: Dan Vannelli
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the opportunity to weigh in on this development project in Longview. Cowlitz County continues to have a high unemployment rate. We need these jobs and we've paid a high cost with this drawn out permitting process so far. It's time to stop the delay and bring about development and economic relief. We must support Americans looking for work. Millennium Bulk Terminals is one way to do that. Please don't hold them up any longer.

Submission Number: ***TRANS-PASCO-M2-00026***

Received: 6/2/2016 12:00:00 AM
Commenter: Vargas
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. My name is (inaudible) Vargas. I have been a resident of Pasco for 62 years, and I'm here to support the Millennium project and believe the Draft Environmental Impact Statement says it all. I don't expect any statements to come up with any different conclusions.

In the 62 years we've been here, we have seen the railroad has been a good steward of the environment and of safety. My family and I speak for many families that live on both sides of the tracks, we've seen that the railroad does take seriously good measures to protect the environment and to protect the people who live near the infrastructure.

So we're very confident that we're dealing with a corporate organization that knows how to care for the environment and for people. I would not support this project if I did not believe otherwise. I think a lot of people have reservations about the coal trains and the terminal and the environment because they haven't seen up close what is really involved.

If you were to visit a railroad yard during the night shift, you would see the caring for the various components of a car. You would see that there's a lot of work that goes into this to ensure that safety and the environment are protected at all times.

I'm very confident. So I voice my support for the project.

Submission Number: ***MBTL-SEPA-DEIS-0003081***

Received: 6/13/2016 5:20:17 PM
Commenter: Erica Vargas
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003255***

Received: 6/13/2016 7:14:53 PM
Commenter: Erica Vargas
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscores my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. Washington has long depended on trade and exports as a vital part of our economy, directly and indirectly creating 40 percent of all our state's jobs. Ushering in developments like Millennium Bulk Terminals - now thoroughly reviewed and vetted - will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0000022***

Received: 4/30/2016 5:06:25 PM
Commenter: George Vaughan
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As a resident of southwest Washington and of the larger global environment I am impelled to comment on this proposed bulk export terminal for coal in Longview. I am greatly concerned about the potential for increased rail traffic that would result . I am unconvinced the coal companies and the railroad would effectively prevent the widespread dispersal of toxic coal dust from these trains. On a global scale, I am much more concerned about the effects from the environmental devastation caused by the mining in Montana, Wyoming, Utah and Colorado. Even more alarming is the harm done to our oceans from the increased carbon in the atmosphere from burning this coal. The greatest insult to our environment would be the proven harm to our World's climate. All of this for the sake of a few hundred temporary jobs and profits for a few corporations? Not in my view to be worth it! Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001815***

Received: 6/2/2016 5:29:59 PM
Commenter: Ronald Vaughan
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life

Submission Number: ***MBTL-SEPA-DEIS-0001645***

Received: 5/31/2016 6:13:03 PM
Commenter: Helen Vaughn
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly support the project and the thousands of jobs this project will create. Washington is highly dependent on trade, and Cowlitz County desperately needs family wage jobs. An EIS that includes newly-invented forms of navel gazing should not have been necessary for a transportation infrastructure project that will facilitate foreign trade and create good jobs for our community. We need this project to move forward without further delays or unprecedented permit conditions. Thanks for the ability to comment. I believe the final environmental review needs to be released ASAP!

Vaughn, Matt (1114)

Submission Number: ***MBTL-SEPA-DEIS-0001114***

Received: 5/24/2016 7:32:35 PM
Commenter: Matt Vaughn
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life.

Submission Number: ***MBTL-SEPA-DEIS-0001113***

Received: 5/24/2016 7:31:30 PM
Commenter: Michael Vaughn
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Regulators need to get back to regulating. Coal is a legal product and needed around the world. It also has the ability to improve the National and financial security of the US. Permits should be issued immediately and regulations for operating legal activities should be clearly defined and published. Companies can make decisions based upon the requirements put forward. Regulatory agencies should not be in the position of picking winners and losers in our economy, simply listing the requirements and monitoring the performance is their function.

Submission Number: ***MBTL-SEPA-DEIS-0003163***

Received: 6/13/2016 6:13:24 PM
Commenter: Michael Vaughn
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001222***

Received: 5/26/2016 6:02:40 PM
Commenter: Nathan vaughn
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium's proposal. Now that the rail corridor has been studied, now it's time for progress on the Millennium project! Thanks for the ability to comment. I believe the final environmental review needs to be released ASAP!

Submission Number: ***MBTL-SEPA-DEIS-0001215***

Received: 5/26/2016 5:58:13 PM
Commenter: S.Rose Vaughn
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for this opportunity to voice my support of Millennium Bulk Terminals - Longview project. This port will benefit the economy of the region, and that of the nation. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. Thanks again to the agencies for allowing public comment on this important proposal. It should continue to go forward with much enthusiasm.

Submission Number: ***MBTL-SEPA-DEIS-0001835***

Received: 6/2/2016 5:48:01 PM
Commenter: Oleg Vdovich
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the opportunity to add my voice to that of others in supporting the environmental study for the proposed port at Longview. The DEIS will present a clear picture of how Millennium Bulk Terminals will proceed in opening and operating this port and the economic, environmental, and social benefits of this project are deserving of approval. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium’s proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0002478***

Received: 6/10/2016 2:20:26 PM
Commenter: John Veentjer
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

This is a great use of an old industrial site. We need more companies willing to clean up and utilize brownfield sites. Cowlitz County continues to have a high unemployment rate. We need these jobs and we've paid a high cost with this drawn out permitting process so far. It's time to stop the delay and bring about development and economic relief. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium's proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0002598***

Received: 6/13/2016 11:03:21 AM
Commenter: Tim Velder
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please consider sound and proven data when considering approval of the Millennium Bulk Terminal for coal exports. Too often flawed, unsupported, and emotional arguments have been allowed to bully decision-makers into closing economic and energy opportunities for the majority of Americans. This terminal would create new markets for coveted natural resources and bring much-needed economic opportunities to low-income regions of the globe.

Submission Number: ***MBTL-SEPA-DEIS-0000626***

Received: 5/20/2016 1:09:00 PM
Commenter: Kathryn Venzke
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to comment on the draft EIS for this extremely important project. I have been waiting for this opportunity for a very long time, and having now reviewed the draft EIS, I can see why it has taken so long. You have taken an unnecessarily broad scope and studied each aspect of it to death. The Millennium Bulk Terminals Project in Longview is a perfect example of an opportunity that could provide the positive and necessary transformation of a long depressed region. I encourage you not to delay moving the project forward. Let’s be clear â€" the project should and will go through careful review to ensure compliance with existing laws. But I urge you not to put up new road blocks to the hundreds of middle class jobs and millions in tax revenues this project will bring to the region. These projects should be reviewed like any other project â€" without special bias based on the type of commodity being exported. Our community cannot afford to delay the jobs that this project will bring. Enough with the schedule delays, bring this process to a close.

Submission Number: ***MBTL-SEPA-DEIS-0001487***

Received: 5/31/2016 1:13:11 PM
Commenter: Marilyn Vercimak
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Our clean coal should be used to reduce damaging emissions.

Submission Number: ***MBTL-SEPA-DEIS-0002165***

Received: 6/7/2016 6:49:52 PM
Commenter: Ed Verlanic
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly support the project and the thousands of jobs this project will create. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage.

Submission Number: ***MBTL-SEPA-DEIS-0001262***

Received: 5/26/2016 6:26:05 PM
Commenter: Jolene Verlanic
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Regulators have been looking at this project for years, and it’s time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments â€" it’s time to let it. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0001843***

Received: 6/2/2016 5:56:39 PM
Commenter: Jolene Verlanic
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to state my opinions on this important issue. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold's site. They are an important part of our community and economy and will do even more great work once their permits are granted. Millennium Bulk Terminals EIS should be thorough but held to the same standards as any other port proposal. We need to do everything we can to strengthen and grow the economy of Washington and the west in general. The project proposed will do just that. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002272***

Received: 6/9/2016 4:44:45 PM
Commenter: Paul Vetter
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I write today in support of Millennium Bulk Terminals coal export terminal. This is a project that is easy to support because it will benefit families both within and outside of its southwest Washington location. The project presents a path to employment for manyâ€"let's makes it happen. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let’s get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002469***

Received: 6/10/2016 2:15:28 PM
Commenter: Paul Vetter
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please move forward with the government’s environmental study. I say let's get moving with the Longview port ASAP. When the trains are loaded in Montana, Millennium puts a liquid cover like a glue on top of the cars. This eliminates a lot of the coal dust that would normally come off of train cars. Millennium is building this world class export facility right! Remember what matters and keep the focus local! This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001686***

Received: 5/31/2016 6:48:00 PM
Commenter: Cheryl Vezzani
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The Millennium Bulk Terminals will bring jobs and stability to Cowlitz County. Export projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen. Cowlitz County has a chronically high unemployment rate. There are environmental impacts of building trades and longshore workers having to travel as far as the Port of Seattle for work on a daily basis, instead of going to a job at Millennium. Let’s keep our jobs local! Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done!

Submission Number: ***MBTL-SEPA-DEIS-0002403***

Received: 6/9/2016 6:13:39 PM
Commenter: Cheryl Vezzani
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it's time Longview went back to work. Millennium has spent 4+ years and 14 million dollars on this permit process thus far. It is time to move forward. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0003291***

Received: 6/13/2016 8:00:14 PM
Commenter: Cheryl Vezzani
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it’s the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward. It has been 4+ years and 14 million dollars. MBTL should be treated fairly and mitigating for impact globally does not make any sense. The draft EIS is thorough and the document should be finalized quickly. Sincerely, Cheryl Vezzani rctcvez@comcast.net 97267

Vick, Laura (1710)

Submission Number: ***MBTL-SEPA-DEIS-0001710***

Received: 5/31/2016 7:12:06 PM
Commenter: Laura Vick
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001574***

Received: 5/31/2016 5:19:54 PM
Commenter: Devin Vincent
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly support the project and the thousands of jobs this project will create. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays.

Submission Number: ***MBTL-SEPA-DEIS-0002294***

Received: 6/9/2016 4:57:09 PM
Commenter: Devin Vincent
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. Cowlitz County has a surplus of industrial sites which impedes the development of the Reynolds Smelter site (due to cost of remediating and redeveloping a brownfield site). Millennium is taking on the redevelopment and can turn around a dilapidated, underutilized site. Grant the project its permits! Now's the time to utilize trade infrastructure. The Millennium Bulk Terminals project is one step closer to being able to participate in this vital business. Thanks to the agencies for considering my comments.

Submission Number: ***TRANS-LV-Q2-00025***

Received: 5/24/2016 12:00:00 AM
Commenter: Barbara Vining
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Well, my name is Barbara Vining. I live in Longview. I've lived here for over 40 years. I have worked and raised my children here. It's a great place to grow up. And I'm very concerned about the future of Longview and the state of Washington. I'm a lifelong Washington resident. I applaud the environmental impact statement for investigating and including as appropriate projected local, state, and worldwide CO2 emissions effects of the proposed Millennium coal project. During my lifetime I have seen the burning of fossil fuels in Asia cause acid rain in our own alpine lakes. I'm very concerned about the increased drought and forest fires -- forest fires caused by less snow pack in the mountains, especially in the Central Washington area where I grew up, the city of Wenatchee was devastated. This is what our future is going to be if we don't take action now. And that's why I'm here today and why I think that the Draft EIS with regard to air quality is significant and important and I hope will be adopted. The Draft EIS statement projects CO2 emissions in 2028 would exceed -- the greenhouse gas emissions would exceed federal and state regulations. The impacts would be permanent. This is from the EIS statement and adverse and significant even if the mitigation procedures were implemented. This statement alone, if adopted as I would urge, would mandate that the Millennium coal project be denied. If indeed we are going to consider the importance of stewardship -- good stewardship of our state. As a long-term resident, I have seen the Trojan Nuclear Power Plant come and go and the Reynolds Aluminium plant come and go and leave toxic waste behind. We need to take a long-term view for sustainable jobs in our future. This decision here will impact my children and grandchildren. Coal is not the future of energy. It is the past. Sustainable renewable energy jobs are the future. When I visited Texas this winter, I noted their visitor center said there are more jobs from renewable energy than from oil. We can do as well or better than Texas. The future, which is rapidly becoming the present, requires that we seek sustainable renewable energy jobs. Both of my children who grew up here have jobs in Washington state that are related to mass transportation and environmental energy. And I would call -- this is what the future is. I call for no action alternative. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002481***

Received: 6/10/2016 2:22:03 PM
Commenter: Edward Virgil
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. Coal exports are a huge opportunity for the Northwest. The infrastructure coal companies are creating will expand trade of all kinds, from apples to software. At a time of increased competition from both West and East Coast ports, Washington needs to seize these opportunities to expand trade and create thousands of family-wage jobs. When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001132***

Received: 5/24/2016 11:34:46 PM
Commenter: Mary Vogel
Organization: PlanGreen
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments

Submission Text

Millennium Bulk Coal Terminal Testimony – May 24, 2016 My name is Mary Vogel and my business is PlanGreen. I'm an urban planning/urban design consultant who stresses walkable neighborhoods as one of the most important measures we can take to reverse climate change. I'm a member of the Congress for the New Urbanism that has long designed and developed walkable neighborhoods in complete communities where residents can walk to meet most of their daily needs. Now much of the planning profession and the public health profession believe that our health and the health of the planet depend upon living in such communities. The people of Washington, through the Washington legislature, showed leadership in this arena when they passed the Washington's Growth Management Act in 1990. That act fosters compact communities and protects farm and forest land. To fulfill the vision of the Washington's Growth Management Act, we should be encouraging more residential and mixed use development around the downtown commercial core of the towns along the route. However, towns from Spokane, the Columbia Gorge to Vancouver, and up the I-5 corridor would see up to 16 additional coal trains rolling through the heart of town every day with this proposal. Increased coal dust and diesel exhaust from coal trains would expose residents to toxic heavy metals like mercury, potentially increasing their rate of cancer and asthma as well as lung and heart disease. If the proposed coal terminal is built, how can any urban planner or public policy maker working anywhere along the path of the coal trains accept the liability of promoting "Smart Growth" development in any community within miles of the tracks? I urge the US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County, to choose the "no action" alternative for Millennium's proposed coal export terminal. By making areas near the rail lines unhealthy and unsafe for redevelopment, it will undermine Washington's Growth Management Act that has helped communities like Spokane, Camas, Washougal and Vancouver begin to redevelop vibrant downtowns and waterfronts. Please don't let Millennium make a mockery of Washington's planning laws that are so important in creating livable communities and fighting climate change. I took the photos of coal trains below from the Confluence Project at Ft. Vancouver. This historic site is already showing impacts from coal dust--as is the "She Who Watches" site in the eastern Gorge.

Vogel, Mary (1132)



Vogel, Mary (1132)



Submission Number: ***MBTL-SEPA-DEIS-0001159***

Received: 5/25/2016 1:30:58 PM
Commenter: Mary Vogel
Organization: PlanGreen
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Millennium Bulk Coal Terminal Testimony – May 24, 2016 My name is Mary Vogel and my business is PlanGreen. I'm an urban planning/urban design consultant who stresses walkable neighborhoods as one of the most important measures we can take to reverse climate change. I'm a member of the Congress for the New Urbanism that has long designed and developed walkable neighborhoods in complete communities where residents can walk to meet most of their daily needs. Now much of the planning profession and the public health profession believe that our health and the health of the planet depend upon living in such communities. The people of Washington, through the Washington legislature, showed leadership in this arena when they passed the Washington's Growth Management Act in 1990. That act fosters compact communities and protects farm and forest land. To fulfill the vision of the Washington's Growth Management Act, we should be encouraging more residential and mixed use development around the downtown commercial core of the towns along the route. However, towns from Spokane, the Columbia Gorge to Vancouver, and up the I-5 corridor would see up to 16 additional coal trains rolling through the heart of town every day with this proposal. Increased coal dust and diesel exhaust from coal trains would expose residents to toxic heavy metals like mercury, potentially increasing their rate of cancer and asthma as well as lung and heart disease. If the proposed coal terminal is built, how can any urban planner or public policy maker working anywhere along the path of the coal trains accept the liability of promoting "Smart Growth" development in any community within miles of the tracks? I urge the US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County, to choose the "no action" alternative for Millennium's proposed coal export terminal. By making areas near the rail lines unhealthy and unsafe for redevelopment, it will undermine Washington's Growth Management Act that has helped communities like Spokane, Camas, Washougal and Vancouver begin to redevelop vibrant downtowns and waterfronts. Please don't let Millennium make a mockery of Washington's planning laws that are so important in creating livable communities and fighting climate change. I took the photos of coal trains below from the Confluence Project at Ft. Vancouver. This historic site is already showing impacts from coal dust--as is the "She Who Watches" site in the eastern Gorge.

Submission Number: ***TRANS-LV-M2-00113***

Received: 5/24/2016 12:00:00 AM
Commenter: Mary Vogel
Organization: PlanGreen
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Mary Vogel (phonetic). And my business is PlanGreen. I'm an urban planning, urban design consultant who stresses walkable neighborhoods as one of the important measures we can take to reverse climate change.

Many in the planning profession and also the public health professions have also come to this conclusion as did the people of Washington through the Washington legislature when they passed the Washington Growth Management Act in 1990. The Act fosters compact communities and protect farm and forest land, as I'm sure most of you know.

To fulfill the vision of Washington's Growth Management Act, we should be encouraging more residential and mixed used development around the downtown commercial core of towns along the route. However, towns from Spokane from the Columbia Gorge to Vancouver and up the I-5 corridor would see up to 16 additional coal trains running through the heart of town every day with this proposal.

Increased coal dust and diesel exhaust from coal trains would expose residents to toxic heavy metals such as mercury potentially increasing their rate of cancer and asthma as well as lung and heart disease. And you heard plenty about that. I don't have to go into that anymore.

So if the proposed coal terminal is built, how can any urban planner or public policy maker working anywhere along the path of the coal trains accept the liability of promoting smart growth development in any community within miles of the tracks.

I urge the Department of Ecology and Cowlitz County to choose the no action alternative for Millennium's proposed coal terminal by making areas near the rail line unhealthy and unsafe for redevelopment. It will undermine Washington's Growth Management Act.

Submission Number: ***MBTL-SEPA-DEIS-0001456***

Received: 5/29/2016 11:05:43 PM
Commenter: Connie Voget
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Connie Voget. I am a member of Earth Ministry and the Green Team at Keystone United Church of Christ. Thank you for this opportunity to comment on the Draft Environmental Impact Statement for the Millennium Bulk Terminal's (MBT) proposal to export coal from Longview. My comments concern the Coal Market Assessment Technical Report and the economic riskiness of MBT's plan. The Coal Market Assessment Technical Report needs to provide more information about the serious decline since 2013 of the Asian coal export market and the seriously reduced economic viability for exporting coal to Asia from Longview in the future. MBT's proposal is based on a miscalculation about the coal export market. This miscalculation is described in a report by Wood MacKenzie, an industry consulting firm ("Planned U.S. coal ports: a swift trip from vital to irrelevant." 2/10/16). The report notes an "astonishing" loss of competitiveness due to a drop in demand. More importantly, however, (considering the time line of the MBT proposal) the report indicates that growth in demand will likely be slow due to the rise of non-coal alternatives, casting doubt on the competitiveness of MBT coal exports in the future. http://www.woodmac.com/blog/planned-us-coal-ports-a-swift-trip-from-vital-to-irrelevant/ Regarding Wood MacKenzie's projections about non-coal alternatives, it is important to note that the energy forecasts of the IEA and the USEIA – sources for the Coal Market Assessment Technical Report – consistently understate the growth of renewables and the impact of renewables. https://www.washingtonpost.com/news/energy-environment/wp/2016/05/13/how-we-get-energy-is-changing-rapidly-and-its-sparking-a-huge-fight-over-forecasting-the-future/ and http://blog.aee.net/news-eia-me-and-the-art-of-being-wrong Relevant in this context is a report by the Institute for Energy Economics and Financial Analysis on the Japanese coal market excerpted and linked below: "IEEFA Japan Briefing: Japan's Energy Transformation March 2016 Key Points • As Japan's electricity sector evolves, coal dependency will decline • Japanese overall energy demand is declining • Proposed new coal power plants risk becoming stranded assets • Japan was one of the three largest solar installation markets in 2014 and 2015 • 2015 will [most] likely stand as a peak year for Japanese thermal coal imports and coal –fired power generation" http://ieefa.org/wp-content/uploads/2016/03/Japan-Energy-Brief.pdf Miscalculation about the coal export market caused Portland and Los Angeles to suffer big losses by approving coal export terminals that failed. http://www.sightline.org/2011/09/12/gambling-on-coal-and-losing/ Wood MacKenzie's report cited above states: "Building new Pacific Northwest coal ports, once seen as essential, is now viewed as nothing more than a risky long-term bet." To enable responsible decision-making, the EIS needs to provide more information about the economic riskiness of MBT's proposal. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001442***

Received: 5/28/2016 6:11:52 PM
Commenter: Richard Voget
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I was gratified to see that the global impacts of climate change were included in the DEIS by analyzing the impacts for Cowlitz County and Washington State from burning coal in Asia. But the analysis was misdirected. Instead, countries already hit the hardest by climate change should have been the focus by calculating the number of new climate refugees displaced by drought, sea level rise and flooding all because someone thought they could make money selling coal to Asia. The urgency of the need to address climate change was not mentioned. Human caused GHG emissions have been the greatest in history in the last 40 years yet with the exception of airplane emissions, they have not contributed to the current warming of the climate because there is a time lag of at least 40 years between when emissions are created on the earth's surface and when they become climate warming green house gases in the troposphere. We can stop emissions tomorrow and things will get much much worse for the next 40 years. If we are to have any hope of ensuring that future generations live in a stable healthy climate then we must start to reduce our emissions now, not increase them. When you are in a hole, the first rule is to stop digging, yet the DEIS states that this proposal by 2028 , would add 3.2 million metric tons of CO2e to the global emissions. The DEIS states that emissions attributable to operations of the Proposed Action are considered adverse and significant. I would go further and say they are immoral and unconscionable. I want our legacy to be that we weaned our way off of fossil fuels in time to preserve the climate for future generations.

Submission Number: ***MBTL-SEPA-DEIS-0001036***

Received: 5/24/2016 6:20:55 PM
Commenter: Crystal Volk
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0001547***

Received: 5/31/2016 5:02:31 PM
Commenter: Karla Vomacka
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. Cowlitz County continues to have a high unemployment rate. We need these jobs and we've paid a high cost with this drawn out permitting process so far. It's time to stop the delay and bring about development and economic relief. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0000051***

Received: 5/3/2016 2:46:48 PM
Commenter: Jack Voorhees
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

This is a great use of an old industrial site. We need more companies willing to clean up and utilize brownfield sites. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality. Sincerely, jack voorhees

Submission Number: ***MBTL-SEPA-DEIS-0002423***

Received: 6/9/2016 6:25:16 PM
Commenter: Michael Vorse
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Moving this project forward is important to me, my family and my community. Coal exports are a huge opportunity for the Northwest. The infrastructure coal companies are creating will expand trade of all kinds, from apples to software. At a time of increased competition from both West and East Coast ports, Washington needs to seize these opportunities to expand trade and create thousands of family-wage jobs. When faced with a poor economic outlook, one must look for ways to improve the situation. Millennium Bulk Terminals proposed project at Longview offers a solution and deserves a fair scoping process. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001757***

Received: 6/2/2016 3:30:52 PM
Commenter: Leigh Vosler
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Please allow the building of the terminal both for jobs in Washington State and Wyoming. It is a win/win situation.

Submission Number: ***TRANS-LV-M2-00020***

Received: 5/24/2016 12:00:00 AM
Commenter: Scott Vydra
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

MR. VYDRA: My name is Scott Vydra. I live here in Longview. I own and operate a family business and choose to raise my family here in Longview. Last year I was elected to Longview City Council. I have lived in Longview for over ten years and see the problems created due to the lack of jobs and the reduced revenues to city coffers because of the lack of industries.

Longview's motto is, A great place to live, work, and play. But we seem to forget the work part and that Longview was created as a planned city, a direct result of industrial expansionism. The proponents of this project use many syllogistic fallacies.

They say we can do better, but offer no viable alternatives. They use an exaggerated photo of a coal facility to falsely depict what Millennium Bulk Terminal is depicting to build here. Lastly, they keep saying Longview will be covered in coal dust. We have had coal trains passing through the Kelso/Longview area since the '70s to supply coal to the Centralia coal powered plant and to Weyerhaeuser.

Furthermore the Draft EIS has 27 pages dedicated to coal dust. The Draft EIS states that emissions from the rail transportation of coal would not be significant. Another section, Millennium will implement numerous measures to monitor and reduce coal dust. We need to focus on the important benefits of this project: The construction jobs, the long-term family-wage jobs, increased tax revenues for the city and county, and increased access to diverse markets through U.S. coal.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002853***

Received: 6/13/2016 2:48:07 PM
Commenter: Adam Wachowiak
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Coal dust is non-toxic!

Wachowiak, Monika (2999)

Submission Number: ***MBTL-SEPA-DEIS-0002999***

Received: 6/13/2016 4:28:06 PM
Commenter: Monika Wachowiak
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003111***

Received: 6/13/2016 5:43:12 PM
Commenter: Brett Wadsworth
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project. Sincerely, Brett Wadsworth wadgawd@gmail.com 82073

Wagaman, Sandra (2618)

Submission Number: ***MBTL-SEPA-DEIS-0002618***

Received: 6/13/2016 11:37:10 AM
Commenter: Sandra Wagaman
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I am in support of this project

Submission Number: ***MBTL-SEPA-DEIS-0000457***

Received: 5/17/2016 7:26:50 PM
Commenter: Ross Wagle
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. We need to stop getting in the way of family wage jobs. MBT supports our community and we support this project. We need to ensure this review process is fair. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0000670***

Received: 5/22/2016 5:16:54 PM
Commenter: Robert Wagner
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

After reviewing the summary of the recent impact statement, I am writing to urge the decision makers to deny Millenium the permits to operate a coal terminal here in Longview. The reasons are many but mainly: 1) The transport of this much coal across the country by rail and by boat will have an negative impact on the environment with potential long-term hazards that cannot be mitigated. While the study found that coal dust was not a major concern, the graphic in the local newspaper of the mountain of coal that will be transported annually in comparison to the Lewis and Clark Bridge left me in awe. When that much coal is moved and stored it must have impacts that over time must take a take a terrible toll. 2) Locally the daily eight round trips of mile-plus long trains will really have a negative effect on our traffic in town and our quality of life especially for folks who either live or have to drive in those areas. 3) I question the wisdom of trading one toxic industry for another. Millenium is in the process of cleaning up the old Reynolds smelter and then turning around and replacing it with huge amounts of coal. And yes this is in close proximity to both the Columbia River and where Longview get its drinking supply. Suppressing the coal dust requires the use of lots of water and I believe the study was concerned with how the used water could be contained. 4)Global Warming. The transporting and eventual burning of coal has a terrible impact on our world. Doesn't it make sense to find another use for this port? A use that doesn't have so many negative local and global impacts?

Submission Number: ***MBTL-SEPA-DEIS-0002209***

Received: 6/7/2016 7:22:28 PM
Commenter: Zachary Wagner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our economy and our families are suffering. We can do something about this by supporting the proposed port at Longview that will put people to work quickly and will keep them gainfully employed for years to come. Media coverage would have us believe that transporting coal by rail through our state is unprecedentedâ€"it’s not. We’ve transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. Thank you for letting me submit my opinions and show my support for the project.

Submission Number: ***TRANS-LV-Q3-00002***

Received: 5/24/2016 12:00:00 AM
Commenter: Elizabeth Waldorf
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm Elizabeth Waldorf. I live in Corvallis, Oregon. I'm a retired college environmental science teacher.

In the 1990s, I read Thom Hartmann's book, The Last Hours of Ancient Sunlight, and it taught me the value of fossil fuels.

Fossil fuels are concentrated energy, and so they allow us to do many, many things that prior to their discovery we couldn't do except with horsepower or human power. So they are an enormous asset. We have used them to extremes and have burned so many of them that we've polluted our atmosphere, creating the greatest threat humanity has ever had. They literally have the possibility of driving us to extinction.

So this is a time when we need to appreciate them and save them and keep them out of the air.

Public Comment on the Millennium Coal Facility DEIS

My name is Lisa Waldvogel. I live and work in Longview as an attorney. My comments are intended for Cowlitz County, as well for the Department of Ecology. I grew up in Joliet, Illinois and as a young child spent summers swimming in an abandoned strip mine and saw first-hand the barren landscape it left behind. After law school I moved to Washington for the lure of outdoor adventure and fresh air. I've settled in Longview, and thanks to Millenium, my dreams of clean and green are being threatened. A coal export terminal would be unsightly, bring filth into our community and bring demise to the health of children, the elderly and those who are medically fragile. The greatest impact from the mill would be felt along our multi-directional downwind zones both in the river industrial worksites and among all the adjacent residential neighborhoods. Here multicultural residents already endure poverty and discrimination to which grit and dust would only add to their burdens.

While the DEIS is insufficient in some areas, it offers enough proof that Millennium does not meet state and local standards. All we need to do is look at the industry's track record and see what citizens in other coal export towns are saying. Residents complain of things such as black grime in their neighborhoods, on their homes, and on their fishing boats, increasing asthma rates and coal dust blacking their local waterways. (I obtained this information from a Sightline article dated April 29 of this year..I will submit that with my statement). The final EIS should look harder at real world examples of coal dust pollution in terminal communities.

I am requesting the No Action Alternative. Coal Export Facilities Make Bad Neighbors.

Sightline INSTITUTE

COAL EXPORT FACILITIES MAKE BAD NEIGHBORS

Documenting the spread of coal dust at export terminals.



Author: **Eric de Place and Deric Gruen**
(@Eric_deP) on April 29, 2016 at 3:00 pm

This article is part of the series Northwest Coal & Oil Exports

Several West Coast communities are considering whether to roll out the welcome mat for new coal export terminals. In evaluating the merits of these proposals in places like Oakland, California, and Longview, Washington, it's useful to examine the industry's real-world track record. As one study of coal port operations put it, "coal terminals by their nature are active sources of fugitive dust."

Seward, Alaska

In Seward, Alaska, residents sued the local coal port in 2009 because debris coming from the terminal's loading systems regularly coated nearby fishing boats and neighborhoods with black grime. The residents' suit stated, among other things, that the conveyor system for loading ships dropped coal dust into Seward's scenic harbor, violating the US Clean Water Act. In 2010, the state of Alaska fined the railroad company that delivers coal to the terminal $220,000 for failing to adequately control dust, but a legal resolution was painfully slow, and the terminal operators resisted at every turn.

The case finally settled in December 2015 after the 9th Circuit Court of Appeals found that coal falling into the bay was not allowable under the company's general stormwater discharge permit and the US Supreme Court opted not to hear an appeal. The settlement still allows the coal terminal operators to discharge "incidental" coal during the ship-loading process as long as they are following guidelines issued in a state permit. The companies involved were released from any admission of violations, as well as from liability in civil lawsuits. The suit and settlement only covered the coal terminal's loading system, however, and local advocates still hope to find a way to prevent the spread of coal dust from the delivery trains and on-site coal stockpiles.

British Columbia

British Columbia's Westshore coal terminal, which ships about 24 million metric tons per year, sits on a peninsula jutting into the Strait of Georgia. Some residents of Point Roberts, a beachfront community three miles away, complain that coal dust blackens their homes, patio furniture, and boats moored in the local marina. A 2001 comprehensive study of coal dust pollution in Canada found that the Westshore Terminal emits roughly 715 metric tons of coal dust per year. A separate study recently conducted by researchers at the University of British Columbia found that the concentrations of coal dust in the vicinity of the terminal had *doubled* during the period from 1977 to 1999.

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In northern British Columbia, the coal export terminal at Prince Rupert is such an active source of dust that the facility's operators regularly send out contractors to powerwash the dust from homeowner's properties.

The American Southeast, and beyond

The Lamberts Point Coal Terminal in Norfolk, Virginia, which ships 28 million tons of coal annually, is legally permitted to release up to 50 tons of coal dust into the air each year. Black grit from the coal piles commonly coats cars, windowsills, and plants in neighboring communities. Neighbors worry that the dust is responsible for the vicinity's elevated asthma rates.

In Newport News, Virginia; Charleston, South Carolina; and on the Mississippi River, coal dust routinely blankets neighborhoods and local waterways. And Sightline has documented that coal dust is also widespread near terminals in Australia, India, and South Africa.

An unwelcome neighbor

The scale of likely dust pollution at the export facilities planned for the West Coast is unclear. Project developers are promising to install mitigation devices that they say will control dust, yet it's highly unlikely that the coal dust can be contained entirely. Huge piles of coal will stand outdoors in wind and weather and frequently be shoveled into new positions by giant bulldozers, stacker-reclaimers, and other machinery.

Coal dust problems plague export facilities across North America and around the world. Because these facilities require port operators to store coal in large uncovered piles at terminals, these piles can feed prolific quantities of dust to the wind, especially when terminal machinery are loading and unloading the fuel. The grime is a nuisance for nearby property owners, a potential threat to local wildlife, and maybe even a risk to human health. In forthcoming articles, Sightline will take a closer look at what scientists say about the impacts of coal dust.

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Tagged in: Coal, Coal Dust, Coal Export, Longview, Public Health, Westshore Terminal

Previous article in series:
« What is the Magnuson Amendment?

Next article in series:
Lummi Nation Defeats Coal Export Terminal »

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Submission Number: ***TRANS-LV-M2-00076***

Received: 5/24/2016 12:00:00 AM
Commenter: Lisa Waldvogel
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

SPEAKER 69: Good evening. My name is Lisa Waldvogel. I live and work in Longview as an attorney. My comments are intended for the Department of Ecology. I grew up in Joliet, Illinois. And as a young child, I spent summers swimming in an abandoned strip mine and saw first hand the barren landscape it left behind.

After law school I moved to Washington, the big lure of outdoor adventure and fresh air. I settled in Longview. And thanks to Millennium, my dream of clean and green are being threatened. A coal export terminal would be unsightly and bring filth into our community and bring demise to the health of children, elderly, and those who are medical fragile.

The greatest impact from the mill would be focal on our multidirectional downwind zone both in the river industrial work sites and among all the adjacent residential neighbors. Here multi culture residents already endure poverty and discrimination to which coal dust would only add to their burden.

While the DEIS has to be sufficient in some areas, it offers enough proof that Millennium doesn't meet state and local standards. All we have to do is look at the industries' track record and see what citizens in other coal exports towns are saying.

Residents complain of stains such as black grime in their neighborhoods, on their homes and their fishing boats increasing rates of asthma, blocking their local waterways. I have information from a site line article. I will leave that with you.

The final EIS should look harder at real world examples of coal dust pollution in terminal communities. I am requesting the no action alternative. Coal export facilities make bad neighbors.

Submission Number: ***MBTL-SEPA-DEIS-0002487***

Received: 6/10/2016 2:34:10 PM
Commenter: Bill Walker
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments
Submission Text
In these comments I will deal qualitatively with serious issues associated with this project. I simply don't have the resources to do so quantitatively. But that doesn't lessen their importance. They should be seriously considered before making a decision on this project. Please see the attachment.

Comments on the Longview Millennium Bulk Terminal DEIS

The crux of most of this is that the applicants have followed the too often used path of pushing the cost of their doing business onto uninvolved third parties who should not have to bear any such burdens.

Scope of the EIS

The EIS did not look at impacts that will result solely from approval of this project but beyond Washington State's borders. This is a serious flaw.

Groundwater and Surface Disruption

The EIS looked only at the effects on the immediate terminal area. Project approval will directly result in surface mining of massive acreages in the arid west. The surface disruption and pollution or destruction of ground water resources which are crucial to ranchers, farmers and other residents of the West, will be substantial.

Because the reclamation rate is so low for the current mines, these effects can be presumed to be to a very large extent permanent.

Reclamation efforts can be expected to continue to decline as global coal prices continue to decline. Arch Coal has already declared bankruptcy. (That their corporate officers then claimed bonuses while trashing employee pension funds bodes very poorly for any responsibility they may owe to society as a whole.) Much or most of the disturbed/damaged area and water resources will likely only be reclaimed at future public expense. As demands for lower taxes continue, the likelihood of adequate reclamation becomes very low.

Coal dust

The DEIS cited rail roadbed degradation as a result of coal dust deposition.

Air modeling and deposition discussions assumed management practices of load shaping and top-coating. I found no mention of whether these practices are enforceable. In light of the recent derailment, oil spill, fire, and contamination of the Columbia river, this could be a very serious oversight.

Minority and Low Income Populations

In Billings low income housing, which includes most of our minority population, is located from less than a tenth of a mile, to a mile and a half from the tracks. The addition of 16 trains per day at all hours will certainly result in sleep disruption, and associated health impacts.

All emergency medical services are located north of the tracks. The low income population is mostly housed south of the tracks. There are four access routes above or below grade. The rest, including the

most direct access from the South Side, are at grade. Even after a train has passed there is considerable delay in clearing the gridlock through the intersections North of the tracks. In an emergency situation the delay in either waiting or rerouting could have serious consequences. With 16 trains per day that effect, as well as the lost productivity to businesses using those routes could result in significant losses.

But there is extremely little likelihood that BNSF or any of the coal companies will contribute anything to the tremendous capital cost needed to reconnect Billings or any of the other rail communities that would be seriously affected by this project.

Climate Change

Much of the resistance to taking action on climate change points to China's coal consumption. Why should we make any sacrifices if they don't? That argument makes no sense at all when we are the ones selling them the coal.

Among the scientific community there is certainty. The effects we are seeing today are entirely consistent with what atmospheric scientists predicted decades ago, including what Exxon's own scientists predicted in the 80's. A few of these effects are as follows.

- In many places around the world climate change is already catastrophic. In Africa, Mt. Kilimanjaro used to have a large ice cap, which provided year round runoff to the surrounding lowlands. Cattle had been there so long they became not just part of the culture, but part of the religion. Now the ice cap is all but gone, along with the runoff. The cattle are all dead or gone. And the people have to be suffering too.
- In the Andes, the same circumstances are occurring. They are expected to result in the displacement of over a million people.
- In Alaska, coastal villages have washed away because of the disappearance of sea ice that protected them.
- California has had its worst drought ever. Southern California still has had little respite. The Pacific Northwest drought is expected to persist this year. Flooding and droughts are increasing world wide.
- Bark beetles have killed millions of acres of forests across the West because winters are not cold enough, and summers are too dry.
- Weather is getting more violent and destructive. Aside from mile-wide tornadoes, the warm ocean temperatures have spawned three superstorms in the last few years. Last year the highest winds in a hurricane ever in the Pacific were recorded.
- Globally, the oceans have become more acidic because of the added CO_2 emissions, as well as much warmer, resulting in damage to reefs, and a global decline in the oceans' productivity – a very bad trend.
- The ranges of wildlife species have shifted north. Some decline because they have nowhere to go.
- And the earth's surface temperatures continue to rise. 2014 and 2015 were successively the hottest years ever recorded. All of the years since 2000 have been in the top 20.

The substantial and unnecessary emissions directly caused by this project would be permanent.

Submission Number: ***MBTL-SEPA-DEIS-0003828***

Received: 6/14/2016 1:20:33 AM
Commenter: Carolyn Walker
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments
Submission Text
Carolyn:

Hello, my name is Carolyn Walker. I used to be Carolyn Alderson. I lived along the Tongue River for 20 years of my life. I raised my 3 children there. There is an interesting story about a law and a regulation that actually stopped something. When I lived down there, the Northern Plains Resource Council, I was part of it, was just beginning. That's when you all heard of the Tongue River Railroad. The Tongue River Railroad was thought of and started because there was a mining plan for that area, right on the Tongue River. It was called the Montco Mine.

Well there's a nice picture of me shaking hands with President Carter in 1977 at the signing of the strip mining bill. In that bill there's a piece of the legislation that says, "There shall be no strip mining on Alluvial Valley Floors." The Montco Mine was right on the Tongue River. It caused some difficulty in the community. I just wanted you to know that there are ways to use legislation and rules to stop bad things from happening. My recommendation is that we recommend no action on the Longview Port.

Steve Running: Yes, I want to particularly point out what I see happening in the global coal markets and global carbon cycle science. That's the stage that I work in, global carbon cycles. We, probably a decade ago, first identified really clearly that the biggest single carbon emission by humanity is burning coal for electric power. It became clear to us right at that point that everything else we do in trying to reduce carbon emissions wasn't going to matter at all if we didn't, first and highest priority, quit burning coal for electric power.

That was over a decade ago. It didn't seem like we were making much progress until about the last year. I can finally say that we've had a pretty good year in global policies. Obviously we all know about the Paris Climate Agreement where every nation signed on to a commitment for driving down carbon emissions, and for most countries that first biggest carbon emission is burning coal for electric power.

What's more immediately relevant to us here is that China not only signed the Paris Agreement, but China actually does a 5-year strategic plan for the nation. What a concept to actually plan the future of your nation. We've got learn something here. In the last 5-year plan, China has publicly announced that they will quit importing coal. What we're clearly seeing is that in 2014 and 2015, China's coal imports went down by actual statistics, so they're making good on this strategic plan that they've announced.

They are starting to drive down their purchasing of imported coal. Of course, their 2 biggest sources are Australia and us. They have already announced that they have a strategic objective to quit buying coal. I can't imagine a worse time for America to be building more coal infrastructure when the biggest customer has already announced publicly that they're going to quit buying. This is really almost a no-brainer.

What I also see now in this last year is that the world financial community has really started to catch on that long-term fossil fuel investment, and particularly long-term coal infrastructure investment, is just plain a bad idea. It's a bad investment. You have very high probability of losing your investment with the trajectory of the global economy and energy. When the world bank and Goldman Sachs, I read almost every week another major financial institution announcing that they are getting out of coal investment ... What we see here is the local version of that same decision point.

You would think this ought to be an easy decision, that the last thing the Pacific Northwest would want to do is invest in long-term infrastructure for coal export when a major customer has already announced that they're going to be capping their imports. I think this is to me, at the global scale that I work at and study and follow, this really should be a pretty easy decision then. This is certainly not a terminal that we want locally, but that even makes any sense in terms of a larger financial picture. It just doesn't make sense one bit. I think that's what I want to leave with you on this topic. Thank you.

Paul Smith: I'm really happy to get a chance to comment on the health implications of the increasing coal shipments by rail for our communities and others. It's easy to make the case that negative health impacts with coal will occur because they've been occurring for the last several hundred years. There's no reason to think a little bit more is better.

I hope to stress the health threats local to Missoula and also stress that this new threat will be greatest on the vulnerable, including children, infants, the unborn, and the elderly. I also have a list of references that I always feel nervous talking and making statements without. If anybody wants the list of the references that at least give the health implications, please see me. Because I take care of children and infants with lung disease, obviously my main concern at the local level is the increase in air pollution from these diesel fumes, coal dust, and worsening climate change.

Data is substantial showing that coal trains do increase bloom concentrations. Diesel emissions are recognized as carcinogens, which was previously noted, and contain toxic substances such as polyaromatic hydrocarbons and particulate matter or PM. Coal dust also adds to air pollution in the form of particulate matter. Of the 6 criteria of air pollutants that the EPA is mandated to regulate, particulate matter is perhaps one of the easiest to track and to correlate with health effects.

It's generated a vast amount of medical literature. We know there is PM increase as public health worsens. We also know that when we lower particulate matter, population health improves. That's an important concept and lends significant credibility to particulate matter being culpable, and justifies action that lowers air pollution. Particulate matter leads to lung damage and diseases such as asthma and COPD. Children are at the highest risk because their lungs are developing and they have more life years of exposure.

This often worsens over decades from accumulating scar tissue along the airways by repeated injury. We have no cure for asthma. For today's living asthmatic children, they may end up being tomorrow's asthmatic cripples. In health, particulate matter also leads to diseases distant from the lungs such as heart disease, stroke, and cancer and even adverse effects on pregnancies and fetal tissue. Infants born to a mother exposed to high concentrations of particulate matter are born smaller, and with impaired lung function.

These more systemic effects outside of the lung happen in part because fine particulate matter can also cross pulmonary system directly into the circulation and they release whatever poisons they contain. Missoula already struggles with air quality in a large part because of our valley inversions that attract pollutants. Despite strong efforts to decrease particulate matter, we often, here in Missoula, are close to the prescribed threshold by the EPA for particulate matter.

There is no safe lower threshold. The more time one spends in high exposure of particulate matter, the greater the effects. Again, this is of special concern to children. Another health concern with coal dust is increased chance of train derailments. You might recall an article in the Missoulian last year quoting the Department of Transportation estimating that there would be over 10 derailments per year in the US of trains carrying nothing but ethanol and oil cargo alone. Missoula is a very populated area. It's time we realize that with only 2 hospitals in our town, we would struggle to handle the type of derailment disaster that hit Quebec killing 47 and devastating a small

town.

Then finally the effects of coal combustion on climate change are already significant here in Montana. As it was noted, we've already come through 2 of the warmest years on records and the warmest April on record. Our snow pack is already lower than normal this year and it's disappearing. Our farmers and ranchers are threatened. Increased forest fires and hot weather will again threaten our health and our children's health.

By way of closing, one of my favorite quotes when giving a talk like this is from CF Elliot in 1909. He was then secretary of Anaconda Copper Mining Company. He stated, "We have the perfect right to carry on a legitimate business and if incidentally we should pollute the atmosphere nobody has the right to complain until specific damage gives them a cause of action." This statement really describes the position that we're in as a company.

We can't stop a process legally until we can show harm. By then, the ground, the air, and the water are contaminated, and our children are sick and it's too late. So ask yourself when we're coming through these discussions what angles are we heading in? Is the public being shouldered with the responsibility to prove harm or is the impetus on the industry to prove there's no harm? Harm to health has already been shown. There is specific cause for us to halt more pollution.

John: Good evening. I'm John Woodland. I retired in January as the Superior, Montana Fire Chief. I'm speaking from my background in emergency services, I do speak for myself. Superior is one of the many small towns along the rail line that this project will negatively impact. Emergency services and access to many of my district's neighborhoods require crossing the tracks. That's true of many other towns along the rail line. This is what's hauling our water supply across the tracks.

I personally waited at a grate crossing for a train to pass while on an emergency service response. This proposal lacked the train traffic. It increased the likelihood emergency services will be negatively impacted in communities all along the tracks. The tracks in Mineral County in places are built right along steep mountainsides next to the Clark Fork of the Columbia River. Trains fall off these tracks sometimes into the river and not that infrequently.

In my 10 years as the fire chief there have been 2 trains in the river in Mineral County. One visible from my home, included empty oil cars, and the other dumped Boeing fuselages into the Albertan Gorge. More traffic means more wrecks. More traffic will also mean more pressure not to hold up the trains for maintenance work which means yet again more wrecks. For Montana, Eastern Washington and Idaho, it also means less access and higher prices to ship agricultural products. For emergency services, today the 800-pound gorilla in the room is climate change.

If you don't think that's emergency service issue just look at the newspaper for the last week, at the evacuation of between 80 and 90,000 people from Ft. McMurray in May in

Northern Alberta, months before there's supposed to be a fire season in that part of the country. This is the future for the entire inter-mountain west if we don't act decisively now with climate change. We cannot continue to invest in fossil fuel projects, such as Longview, and have any chance of limiting the worst impacts of climate change. I urge you to say to no to the Longview Coal Port and yes to acting decisively on climate change now before it's too late.

Michael: My name is Michael Daniel Bolt. I'm a student at the University of Montana. I'm running for House District 98, Montana State District. I think preventing any new coal mining is the best choice. I'm also interested in bringing ideas of increasing government control over the natural resource industry including the coal industry. I believe government run operations of the coal industry would allow us to shut down that industry more responsibly and make any future natural resources extraction use projects really more beneficial to the Montana people. That's the main concession. That's all. Thank you.

Carolyn: Hello, my name is Carolyn Walker. I used to be Carolyn Alderson. I lived along the Tongue River for 20 years of my life. I raised my 3 children there. There is an interesting story about a law and a regulation that actually stopped something. When I lived down there, the Northern Plains Resource Council, I was part of it, was just beginning. That's when you all heard of the Tongue River Railroad. The Tongue River Railroad was thought of and started because there was a mining plan for that area, right on the Tongue River. It was called the Montco Mine.

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Jim: My name is Jim Parker. I live in Missoula Montana. As a Montanan along the rail corridor between the Powder River Basin mines and the proposed terminal I oppose the Millennium Bulk Terminals because of the associated increase in coal train traffic through my community. The increased coal train traffic will bring with it increased air pollution and health risks from increased coal dust and diesel exhaust and increased noise pollution.

In addition, the increase in coal traffic through my community will reduce access across the tracks and cause traffic delays for citizens, commuters, for emergency response vehicles when there's a medical emergency or fire, or a need for police. The additional train traffic will also provide greater potential for vehicle collisions with trains and for pedestrian accidents.

As a Missoulian and Montanan, I'm asking that the EIS fully analyze and consider the impacts of this port and the increased coal train traffic would cause here in Missoula and across Montana especially as it relates to the above sited impacts. The proposed project’s impacts are real and significant to Montanans and are connected in cumulative

result of what happens if this project is approved.

The EIS prepared by the court in the Washington Department of Ecology in Cowlitz County must include all the connected and cumulative impacts in Montana that will result if the MBTL facilities are approved and constructed. These include the significant connected and cumulative impacts on the project all the way back through Montana to the Power River Basin Coal Mines in Montana and Wyoming.

The increased rail traffic in Montana must be addressed, analyzed, and its consequences fully considered in the EIS. More trains in Montana will mean an increase in the amount of airborne pollutants, from diesel engines as well as from coal dust. Medical studies have shown a clear link between both diesel air pollutants and coal dust and disease.

While those with chronic disease, the elderly, young children, and pregnant women are most at risk, the health effects from particulate matter exposure may occur years later. Even healthy individuals need to be concerned. These issues must be addressed, analyzed, and their consequences fully considered in the EIS. The MBTL facility will directly lead to an increase in the burning of coal. The link between increased coal burning and associated public health problems cannot be ignored and should be included, analyzed, and the consequences fully considered in the EIS.

Finally, because the sole purpose of the MBTL facility is to facilitate the shipping of coal being transported from the PRB to its final destination in Asia, where it will be burned for energy, I also believe that the EIS must fully consider the long term and direct effects that this action will have on the global climate.

In conclusion, I strongly oppose the proposed Millennium Bulk Terminals Longview facility. The connected and cumulative impacts to Missoula, and all of Montana, from the proposed facility, are real and significant. The EIS prepared by the co-lead ggencies for this project must address, analyze, and consider all the connected and cumulative impacts this proposal will have on Montana. Please reject this proposal and take no action.

Thank you.

Harold: I'm Harold Hoem from Missoula. The whole town of Butte Montana went through a long period of horrible air quality early in this century because of ore smelting. Read a book called Smoke Wars. People sickened and then died especially underground miners like my grandfather who was cut down in the prime of life by lung disease. The corporate giants called the air pollution a nuisance. It was deadly. Oh, what a nuisance Biff was to my family.

What are some corporations proposing to do this century later but ship Montana coal overseas so citizens there can get sick and die from nuisance called coal? A friend of mine who was a former coal mine manager says this, "The problem with the coal mining industry is the product is a poison”. We know that CO2 is increasing dramatically. It is now over 400 parts per million. Humanity hasn't seen this stuff but it is affecting climate

change dramatically.

The current wildfire in Ft. McMurray in Alberta Canada caused the evacuation of over 88,000 people. The smoke from each building is hundreds of miles away. Perhaps a wake-up call for Montana. We have rapidly declining snow pack and are facing longer and harder, tired, and more dangerous fire seasons and possibly worse than Iroquois. For sure a nuisance for residents and a real downer for tourism. The DEIS gives Montana a scant potential.

They say 16 additional coal trains a day would go through Missoula that cite inflated numbers for existing traffic of 25 to 28 trains. We currently see only 13 to 15 trains. 16 more trains would double current traffic. The effects would ripple down all the impacts of safety risks, derailments, noise, dust, the laser crossings et cetera. They should know where our current capacity is and give assurances that deficiencies will be mitigated. My last word , bring down CO2 emissions by switching to renewables. Vote no action. Show the US means business in climate litigation.

Gary: I'd first like to thank Northern Plains and the Hoems in particular for it, and Les Anderson coming all the way from Longview to speak here. The speakers, it's been a very nice haven. Thanks for this opportunity to comment. Hi there, I'm Gary Mattson. I live in West Riverside, which is a suburb of Milltown. I really seriously, if the most serious effects of this port certainly have to do with health and climate change.

For those reasons, I am just baffled that so many people either ignore the science, or deny the science, or simply don't know about the science. I cannot understand why we have so many people that are not supportive of recognizing climate change demand. Some of the effects aren't realized. I can see in my community. Milltown has one singal entrance to it across on the south side of Powder River, there is one railroad crossing.

If that railroad crossing was blocked, no emergency services can occur. Our fire chief manager will recognize that concern. In Missoula County that's 10. That has a significant impact. The additional of 16 trains would really be a big impact on emergency services. For multiple reasons, I would strongly recommend that no action alternative.

George: Thank you, thank you all for being here. My name is George Price. I was asked to represent an organization I belong to named Indian People's Action. Indian People's Action asked me to be here as an environmental issues coordinator.

I would like to put our input collectively in here; just the fact the basis what coal is doing to our climate and the life on earth. I think that should be enough reason to keep it in the ground, not transport it anywhere. Anybody who's paying attention and looking at how fast this is escalating climate change to an unpredictable level at levels with all the other elements that are being released. Rising sea levels, you can go down the whole list if anybody's honest about that, you would say yes, let's stop all of this.

I'd also like to say let's look at the paradigm shift and deeply question a society that creates incentives for people to write environmental impact statements that are

intentionally lying to the people for profit, for money in a society that lives for money. I'm not going to go into my whole historian's diatribe there. I had often wondered what if the people who came from across the ocean, and likeminded people that welcomed innovation in Massachusetts had come to learn instead of to control. It's great. Can we start on the right foot now? I recommend the no action on behalf of Indian People's Action of Montana.

Dave: Hi, my name is Dave Dittloff. I'm the regional representative for National Wildlife Federation. Most of you are probably aware of National Wildlife Group. We're the folks who put on Ranger Rick Magazine. That's our biggest identifier here with the kids.

In 3, 4 years that that's going to take, yet there's nothing coming back up the streams in order to spawn salmon. The impacts are almost certainly down to relating to some of the impacts here. Last year, last summer's conditions literally had most of the species dying, most of the adults coming back to the rivers and streams here to the headwaters of the Columbia River Basin died due to high temperatures, directly related to climate change.

I want to talk a little about, quickly here's something that hasn't been hit hard today, talk about wildlife. It starts right from the beginning. You look at the mine site here, the direct habitat displacement, the coal recommendation that follows it, that impacts wildlife. If you look at what happens on the mine sites with water, that impacts fish and wildlife. The next connector we look at has it transferred over? We look at the trains. There's been a lot of talk about human health and consequences here which are really important. Those same impacts are related to wildlife for particularly the fisheries here. That coal dust gets in the streams. There's mercury concern with it here and other neurological issues are a concern.

Mercury is bad for people eating the fish as well. We've got dozens of streams and multiple dozens of lakes in Montana that had mercury consumption warnings here. You can only eat so much of the fish. That's an impact to wildlife. You look at the ports, same thing here. The direct construction of the ports, this place is habitat for sure. That has real consequences to the fisheries. You'll see salmon come in and out of the ocean as well here.

Lastly, climate change, I got to talk to you about salmon. Name a critter, even the biggest critters, white tail deer, elk, etc. that think generalist that those are for generalist. There's impacts here. More and more research that's done it's really impact of Montana's out pour heritage, it's culture, what we like to do here whether it's sightseeing, hunting, fishing, what have you here. Fishing is a multi-billion dollar industry in Montana and the Pacific Northwest. There's economic reasons associated with wildlife as well here. I appreciate it. No action alternative makes sense for wildlife.

Dave Jones: Hello, my name is David Jones. I've been a fly fishing guide in Montana for over 30 years. Dave just inspired me to get up here and talk about what I see in my career fishery that I work primarily in. My season has been shortened by an average of about 6 weeks in the 30 years I've been doing this. We don't have clients in August anymore at all because of

the low flows. Half the time our rivers are shut down because we have to worry about railing over there. Anybody that watches the forester around in the spruce moss and the beetle kill, it's just obvious that Montana is being really affected. We mentioned the economic impact, but really we're talking genocidal, ecocidal impacts for climate change. We ought to think in those terms really. This is an emergency. I recommend no action on the terminal. Thank you.

Steve: Hi, my name is Steve Schwartz. I live here in Missoula. I'm a professor interior of the Department of Communication Studies at the University of Montana. I teach and do research in environmental communication. No matter what the coal industry says about the free market, their goal is to get government on their side to make the market work for them whether it's supporting carbon cash receipt frustration, whether it's blocking the clean power plan, or supporting coal export infrastructure like MBT as a goal. It's past time for us to use our voice to remind government agencies who's side they need to be on and who's interest they need to represent.

The connected and key note we've heard about tonight on public health and safety, on air, land, and water, on wildlife, and on climate change are common in house. They're shared by the residents of the Pacific Northwest, shared in common by the people who live in Washington and Idaho and here in Montana. We all deserve a voice in this decision. For that reason, I want to thank all the organizations that have made this opportunity possible for so many of us to express our voices. To protect the commentators in the Department of Ecology, to take no action, thank you.

Jim: My name is Jim Roach. I've been a Missoula resident for 45 years. I don't understand why it's draft Environmental Impact Statement doesn't address impacts for rail traffic in Montana. That seems sort of ridiculous. It seems like a rip off. On behalf of my family, and my friends, and a lot of people that I know are neighbors, I just want to say we don't want any more coal dust. We don't want any more diesel fumes. We don't want any more threat of derailment. We don't want traffic complications from increased rail traffic. We don't want the noise.

Most of all we don't want the climate impact. We don't want the endless smoky summers. We don't want the low stream flows and the sick fish. We don't want the reduced fishing opportunities. We don't want increased beetle kill. We don't want disappearing biodiversity. We don't want damage to agriculture. We don't want the drought. We don't want climate refugees. We don't want shut downs of skiing areas. We don't want this action, no action. Thank you.

Claudia: My name is Claudia Narcisco. I am speaking for myself today. When I was trying to find some things that I was going to speak about, I found an old letter that I had written in I guess November 2013. There goes my letter. I had it on my phone and mailed it to myself. Anyway, it was hard enough to read. I emphasized that connection actions between the mine and the port and Asia and the impacts on climate change and how it would cycle back to us.

I requested that they consider this. I cited a section of the National Environmental Policy

Act. I believe it was section F2 or 2F that specifically directed agencies to consider international ramifications of actions which is not something that we normally associate with, but it's just that it was our responsibility to do that. Obviously those things were not necessarily done, as far as I could tell, to this point.

I hope that's considered.

Submission Number: ***MBTL-SEPA-DEIS-0000253***

Received: 5/10/2016 6:05:23 PM
Commenter: Gary Walker
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The draft environmental study for Millennium Bulk Terminals coal export facility was sufficient. Please move forward. There are many benefits of the project that the community is waiting for. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. Please reach out with any questions.

Submission Number: ***MBTL-SEPA-DEIS-0000665***

Received: 5/22/2016 11:48:07 AM
Commenter: Jerome Walker
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

As a retired physician, I'm very concerned about the adverse health effects of burning coal. Whether the coal is burned here in the U.S. or in China, the particulates and mercury end up in the atmosphere and affect us all. It is contrary to the stated policy of the U.S. government to fight global warming by transitioning rapidly to renewable energy to spend millions on a facility designed to continue reliance on coal, the dirtiest known fossil fuel in terms of the CO2 produced by burning it. As a resident of Missoula, MT., I'm also concerned about the adverse effects of having up to 16 additional coal trains coming through the middle of town each day if this facility is built. Respectfully submitted, Jerome Walker, M.D.

Submission Number: ***MBTL-SEPA-DEIS-0001131***

Received: 5/24/2016 10:03:19 PM
Commenter: David Wall
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

We realize coal is necessary for energy, however the coal industry needs to take a proactive leadership role in protecting the safety and environmental cleanliness along Their entire rail traffic route without any compromise for the the health and well being of all humanity as well as all natural land resources. The uncovered rail cars alone emit harmful dust, coal deposits that fall off the trains at Key intersections and into natural rivers and lakes that they travel next to or cross on all Routes. Their trains create traffic delays, cause accidents and they elevate noise decibel levels that they must resolve for their future well being for all inhabitants in this earth. Railroad companies from the USA and Canada need strict rules of compliance with stiff penalties for non compliance. When all these requests have been executed then a terminal could be effective however time is of the essence so we ask you to resolve our concerns as you meet. Thank You

Submission Number: ***MBTL-SEPA-DEIS-0000763***

Received: 5/23/2016 2:07:20 PM
Commenter: Shirley Wall
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you.

Submission Number: ***TRANS-PASCO-M1-00017***

Received: 6/2/2016 12:00:00 AM
Commenter: Courtney Wallace
Organization: BNSF Railway
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. My name is Courtney Wallace. I'm working with BNSF Railway. I'm based in Seattle and represent 4,000 employees here in the state of Washington. BNSF is behind this project. It means good paying jobs, not only for the members and the residents of Cowlitz County, but also for the railroad. Jobs that are union, jobs that pay family wages, and jobs that are sustainable.

BNSF were the first few who raised issues about coal dust. We found coal dust an issue at the mines in Powder River Basin, not in Washington state. We have fought long and hard to contain coal dust. We continue to make investments that make sure that coal stays exactly where it belongs: In rail cars. We have opened a state-of-the-art, one of a kind facility in Pasco that addresses coal dust as well with our spray system. Since last year we sprayed more than 1,000 trains through Washington. And we'll continue to make those investments.

These are good jobs that not only benefit Cowlitz County, but people in Spokane. Our people in Pasco, our people in Vancouver and all points in between. So we thank you for your thoughtful look at the DEIS and we welcome any questions about BNSF operations, but this is a project not only for Cowlitz County, but for the state of Washington as well.

Thank you.

Submission Number: ***TRANS-LV-Q1-00074***

Received: 5/24/2016 12:00:00 AM
Commenter: Gary Wallace
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Gary, G-A-R-Y, last name Wallace, W-A-L-L-A-C-E. I'm a lifelong resident of Cowlitz County. I was born in Kelso, raised in Kelso and now reside in Kalama. I'm here to comment on the proposed Millennium coal dump for the Longview, Washington deep water port site. I believe it needs to be stopped immediately due to the objective hard science as released by the World Health Organization last week in which it states over three million people a year die from pollution. My observation is the State cannot commit bodily harm or take the life of an individual without due process because coal is a proven health menace and a proven killer of people, an exacerbation of the entire global environment. As such, knowingly and willingly continuing to promote coal is also knowingly and willingly promoting mass murder, period. There's no other way to look at it. So, as such, by contributing to mass murder you're committing a crime which is illegal in the state of Washington. Therefore you have no right to continue with this process unless you can prove that coal is no longer a killer which is against all proven objective hard science accumulated over the last 30 to 40 years from multiple countries. In closing, if you continue and allow this coal dump and know it's against the health of the entire globe and against the entire health of everybody affected from the beginning to the end, you can't go look at a small snapshot in the middle, from the people that are going to profit from this at the debt of everyone else. Therefore, if you proceed with this, I have to charge you with crime against humanity and will proceed in a court of law, period. My name is Gary Wallace. You can reach me at 673-4408. I live in Kalama. I'd be more than willing to speak my mind to the rest of the committee. So you can go along and be personally cited or you can change your ways and stop the murder of killing millions of people every year. I'm not Adolf Hitler's cousin, and I don't think you are. Thank you.

Submission Number: ***TRANS-LV-Q2-00008***

Received: 5/24/2016 12:00:00 AM
Commenter: Gary Wallace
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name Gary is Wallace. I'm in Kalama, Washington, originally from Kelso. Been a lifelong resident of Cowlitz County. I feel that the coal terminal -- proposed coal terminal for Millennium coal is an antiquated energy source. And I believe it is an environmental disaster, as proven by the World Health Organization report released last week that said over 3 million people per year die from pollution, which represents mass murder by an industry knowingly and willingly avoiding objective hard science and to spin everything on their subjective concept of their science in their favor flies in the face of all other science concluded to be -- coal being the death of the planet by multiple countries over multiple decades. So independent science has proven that coal is the number one killer in the world as far as pollution. In addition, it's economically not feasible and it's a bankrupt industry. Number three, it will allow Longview to become an environmental disaster and be tied up in traffic and transportation problems that will decrease the ability for citizens of the county and communities directly affected to transport themselves safely and timely through the community. It's going to cut off emergencies services to the Oregon side as well as inhibit traffic through all of downtown Longview, Kelso area. And in closing, I find that Millennium coal's proposal is counter to the future of the United States and the international environmental treaties we signed, including the one from China that we signed two months ago. I think it is unfavorable for us to allow ourselves to be tied with the fossil fuel industry that is on its way out. And I appreciate your time and I think that it's necessary that you look at the bigger picture from beginning to end since you know by hard science political boundaries do not limit pollution, i.e., China's pollution comes back and acidifies our upland lakes and rivers as is proven by hard science of our own state studies from decades ago. Thank you.

Submission Number: ***TRANS-LV-Q3-00035***

Received: 5/24/2016 12:00:00 AM
Commenter: Gary Wallace
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Gary, G-A-R-Y, last name is Wallace, W-A-L-L-A-C-E. I'm a resident of Kalama and a native of Kelso. I've lived here all my life. Educated at Western California State University.

And as a person that is aware of the political process and the need for a tax base, the idea that Millennium's coal dump -- it's not a terminal, it's a dump -- is going to offset the loss and property taxes throughout Cowlitz County is absurd, period.

The number of jobs being proposed onsite has changed from 30 to 130 to 250, and that includes per Millennium's information, indirect as well as direct jobs. The majority of those are not new jobs, they're already existing jobs indirectly that are receiving new contracts, i.e., office supplies, landscape maintenance, et. cetera. So they aren't really new tax based jobs.

So the amount of money brought in versus the amount of property loss in total in Cowlitz County needs to be examined due to the detriment that I perceive to the community. As such, there should be no action taken on this proposal until improved statistics and financial impact are ascertained.

This is part of the, in my opinion, Department of Ecology's business because it does affect the quality of life, it does affect the ability for Kalama, Woodland, lower Columbia communities, Kelso, Longview, Clatskanie, Cathlamet, Rainier, everybody down to Astoria and Long Beach will be affected by the increased river traffic as well as the increased railroad and highway disruption.

So all of the traffic is going to be a negative impact. So I've got property values that are devalued and not offset by labor -- or wage hour taxes, you know taxes; I've got environmental disaster looking at us, and I've got transportation that cuts off the well-being of the community.

None of this has a positive impact to anyone here local and I see this as a wrong step to this community, for this community. It would be something that I prefer the Department of Ecology in their assessment not look at a snapshot of a place and a time with nothing else interrelated to the rest of the world because that is not realistic. That is a very unhealthy attitude, very unhealthy approach, because everything we know now is interconnected.

Our knowledge base has increased to the point where you can't look at something in a snapshot in the middle of a process, you have to go from extraction, transportation, handling, shipping, and then the international impact on the global environment as well as global international relations.

At this point in time the ultimate of worst scenarios is China, as war mongering nation and a communist government is going to develop coal base and other fuel bases to power up their war in the Pacific, which is looking at us in another ten years, according to my international relations and Constitutional law degree.

So I hope that you take into consideration more than a minute look per subjective science from Millennium and look at objective science proven by multiple years and multiple decades from multiple countries -- throughout the United States as well as throughout the world that are totally independent studies all concluding the same thing, that coal is the killer of all of us. It is the worst scenario.

And it's also contrary to national political directives and international treaties that we have signed, including one directive with China a month ago.

In closing, second time around, I hope you reconsider your position and don't look at jobs as the only answer. That is not part of the Department of Ecology's assessment. It is impact on our quality of life and the well-being of our water and air, which are apolitical.

So the politics of it and the fact that you're supporting one private enterprise over the public good is unacceptable. That would be malfeasant in your performance of your duties. You have one priority, and that is to meet the will, follow the will, and meet the needs of the people, not corporations. We owe no allegiance to this company. It's a bankrupt ancient technology that we need to go on to alternative energies and get off the stepping stone to this power up so far. We need to grow up.

Submission Number: ***TRANS-LV-Q2-00014***

Received: 5/24/2016 12:00:00 AM
Commenter: Gary Waller
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Gary Waller (phonetic). And there's a couple of reasons why I'm opposed to this particular project. When I look at the coal industry, it reminds me a lot of a drug cartel. What they are doing is they have a product that's being supplied basically to addicts. And we need to get the addicts off of the coal. Sure cartel and expansion of the cartel may result in a few more jobs for a few individuals, but it's not good for a society as a whole. As a drug cartel gets jobs for drug dealers, expansion of the coal industry and the effects of the coal industry for distribution also has the same effect. It simply is not acceptable to have employment in this manner, particularly when there's other options. There's other types of employment such as in green energy that can be beneficial without the adverse consequences. The other thing that occurs to me, as I look at this entire proposal, is that we're talking about expanding infrastructure for a dying industry. And it's dying for a good reason. The coal industry has adverse environmental effects. It certainly causes climate change. And it has replacement such as green energy which doesn't have the adverse consequences. But the problem with the infrastructure is that once you build it, it's going to be used. Once you build it, you are going to continue using this coal, and expanding the use of the coal, and creating a market for the coal. Instead you need to limit the infrastructure so the industry, which is already dying, will die a faster death. It is a drug cartel of sorts and it's a drug cartel that we need to control. And one of the best ways to control it is to try to cut off its users. And the way you cut off the users is making it so they can't create additional infrastructure to keep selling their product. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000213***

Received: 5/10/2016 4:54:29 PM
Commenter: Mike Wallin
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our state is trade dependent and a critical part of the import/export infrastructure of the West coast. International trade is essential to the economy of Washington and supports many family-wage jobs. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done!

Submission Number: ***MBTL-SEPA-DEIS-0000569***

Received: 5/19/2016 6:13:12 PM
Commenter: Jerry Walling
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on Millennium Bulk Terminals coal export project. I am very concerned that this environmental review and permitting has taken twice as long as any other port project. What most folks in Seattle tend to forget is that not everyone in Washington lives in Puget Sound. Not all of us work in the high-tech industry, and we still earn good livings as farmers, working at ports or in manufacturing. We make things, harvest and develop natural resources, feed our community and help facilitate trade in our great state. And we need more jobs like this, especially in Cowlitz County where our unemployment rate is 8 percent. Millennium Bulk Terminals can bring great jobs to our county, not to mention the much-needed tax revenues. Let’s not forget about how much time, effort and money Millennium has spent to clean up the port. Frankly, it was an environmental blight on our community, but now it will be a critical link for expanding trade for Southwest Washington. Again, having good jobs and protecting the environment can go hand in hand. Thank you for accepting comments for this important project. Please make the necessary steps to move forward on its approval as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0003249***

Received: 6/13/2016 7:10:35 PM
Commenter: Cajsa Wallwork
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter

Submission Number: ***TRANS-LV-Q1-00009***

Received: 5/24/2016 12:00:00 AM
Commenter: Linda Walmark
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Linda Walmark (phonetic) from Salem, Oregon. I am speaking against the proposal to build a terminal. We are in the midst of a climate crisis and what's been called the sixth extinction event on Earth. This is a critical point in human history, a deeply consequential moment, and we simply cannot continue with business as usual. Mitigation of the coal dust and the other issue with coal trains will only blunt but not decrease or remove the carbon dioxide emissions. We know that the continued carbon dioxide emission is causing global environmental and social destruction. So to build and invest in a new infrastructure for the very case of this degradation, fossil fuels, is monstrous. Once the money is spent on new infrastructure, there will be even greater pressure to continue mining, transporting, and burning coal. This project can't even pretend to be a bridge to cleaner fuels. We must look to the future, not a 19th century energy source to change how we live. To invest in this kind of infrastructure is akin to a huge investment in buggies and whips at the dawn of the auto industry. So we need to work on developing the jobs that come with a renewable energy future. Let's spend our time and energy moving toward that future. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002036***

Received: 6/6/2016 3:19:36 PM
Commenter: Kathy Walsh
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

This is a great use of an old industrial site. We need more companies willing to clean up and utilize brownfield sites. Transportation of coal by rail from mines in Wyoming, Montana and elsewhere to Longview will make use of existing rail transportation infrastructure that is part of a nationwide commercial transportation system. Further, rail traffic across Washington in down. The railroad companies are in the business of managing rail capacity and don't need to be told how to run its business. The rail line was unnecessarily studied get on with it already. The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality.

Submission Number: ***MBTL-SEPA-DEIS-0003245***

Received: 6/13/2016 7:08:09 PM
Commenter: Scott Walstra
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study should move forward in a timely manner. Please allow me to provide my comments in regards to the draft EIS. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. Millennium BT has complied with all EIS requirements in a responsible and environmentally focused manner. This project will transform a large polluted and unusable site back to the community for clean and safe economic growth. I greatly appreciate you considering my input. Sincerely, Scot Walstra walstra@cowlitzedc.com 98632

Submission Number: ***TRANS-LV-M1-00049***

Received: 5/24/2016 12:00:00 AM
Commenter: Scott Walstruf
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. I'm Scott Walstruf. I'm a life-long Washington resident and work in Longview. It's not easy to get a permit in the state of Washington. I've been in development for many years and for a while I was actually a sustainable development consultant. I like the fact that it's not easy to get a permit. It preserves our state's beauty and our resources. Millennium Bulk Terminals has proven itself to be diligent and comprehensive in its remediation of everything that was asked of it in the DEIS. I vote to approve this project moving forward. They've proven themselves to be good citizens in the community, they're doing more than they need to do to make sure they get this right, and quite frankly we could use the jobs and investment here. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001229***

Received: 5/26/2016 6:06:27 PM
Commenter: Michael Walter
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Millennium Bulk Terminals proposed coal export terminal should be approved and the port should be allowed to move forward. It's good for Washington and her neighbors. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium’s proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***TRANS-LV-Q1-00036***

Received: 5/24/2016 12:00:00 AM
Commenter: Darla Walton
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Darla Walton. I'm a Longview resident since 1970. I am hoping that those making the decision will decide that this is not in our best -- what's best for the local citizens, that they will decide not to allow the coal terminal to proceed here. This is, I believe, the last, the sixth location that they've been fighting to have the coal terminal. All of the other sites have said no, so I hope that based on the information we have about the health impact, not only here but also the health impact in China. I know some people who lived in China for a while, Americans working there, and it's a very polluted and dirty place. They had to wear masks a lot of the time and so not only are we providing health issues for the citizens of China, we're also doing it for our citizens here. I'm concerned about the impact of the coal trains as they rumble past the Tri Cities, and we already have problems with Hanford with leakage there. I don't think we have any way to know if this will have any impact on stirring up further leaks at the Hanford Reservation. As a member of the Cowlitz County Health Advisory Board, I want to say this is not the best thing for the health of our citizens. The 300 jobs that Millennium says that they will provide, 300 jobs when we have a lousy place to live. I know citizens that are already saying that they will probably be moving out of the area. There are reasons we're a depressed area, and part of it is the kind of industry that we have here. Longview is not a good place to live. This just adds another thing to the list. Let's find some clean alternatives. For example, I know a person who -- several family members who have just moved down to Utah. They're going high tech down there. They had a steel mill there back in the '60s and '70s that shut down. Yeah, it was a big negative impact when Geneva Steel shut down but now Utah County is booming, they have a high employment rate, Google has gone in there, these tech companies are going in, this big solar panel facility has gone in. That's where a person in my family got a job. I know another person in the family who has moved there because of high tech. Longview needs to have a vision, our area needs to have a vision of where the world is going. Coal is not the direction that the world is going. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001266***

Received: 5/26/2016 6:28:40 PM
Commenter: Diane Walworth
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

As a person living in the Gorge along the rail line, I strongly oppose the proposed Coat Terminal in Longview. The impact of daily rail cars spewing coal dust would impact my health and the livability of my community.

Submission Number: ***MBTL-SEPA-DEIS-0001957***

Received: 6/6/2016 2:07:51 PM
Commenter: Lonnie Wampler
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to state my opinions on this important issue. Right off the bat, Millennium began working with the Department of Ecology to clean up the old Reynolds smelter site. In addition Millennium is working to restore the natural habitat along the Columbia River, it has removed and replaced old pilings, and has brought the existing dock up to minimum standards. Why has this project's permits for the export terminal taken so long? All this delay has done is postpone the cleanup and restoration of a great industrial port site. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let's get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

Submission Number: ***TRANS-PASCO-M1-00044***

Received: 6/2/2016 12:00:00 AM
Commenter: Stephanie Wanberg
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi, my name is Stephanie Wanberg (phonetic) and I am from Pasco, Washington. I have six kids, and I was concerned about the coal dust. And so, I was -- I actually was allowed by BNSF TO go on a tour of the spray facility. I was so impressed with that facility. This is something that they have done themselves. They have gone above and beyond. I know the coal export terminal meets the environmental standards. And those standards are really high. And I've been so impressed with the measures that they've taken. So I hear a lot about the coal dust. But you know what? I don't see that as an issue. And neither did the Draft EIS. So for me it's a nonissue. I don't feel threatened at all by increased train traffic here. And I would encourage you to move forward and grant the permits for this project.

Thank you.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☒ Air Quality
- ☒ Human Health
- ☒ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☒ Coal Dust
- ☒ Greenhouse Gas
- ☒ Climate Change
- ☒ Plants and Animals
- ☒ Marine Species, Fish, or Fisheries
- ☒ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

Coal is an outdated technology. Alternatives exist that do not change the climate. There is no way to effectively mitigate the burning of coal and the production of CO_2 wherever it may occur. The earth's atmosphere affects all living things on the planet. Exporting this dirty

(additional space is provided on the back)

(comment continued)

fossil fuel is a travesty to this planet.

Putting the largest north American coal terminal adjacent to the Columbia River makes ZERO sense. Surely there are other good uses for that property.

The NO Action alternative ~~makes~~ lets the planet have a chance to survive. My grandchildren will thank you.

Marion Ward
Portland, OR

Submission Number: ***TRANS-SPOKANE-M1-00074***

Received: 5/26/2016 12:00:00 AM
Commenter: Rebecca Ward
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. My name is Rebecca Ward. I'm from Bozeman, Montana.

Impact of the Millennium Bulk Terminals extend far beyond Longview or even the state of Washington.

I ask you to give weight to any decision about this project only after you consider the massive impact increased coal activity including mining, transportation, and consumption that will occur with this project.

Montana towns are bisected by rail lines. Increased rail traffic that will occur as a result of this project pose significant health hazards. An increase in coal trains will severely impact communities' emergency response time given the barrier trains form. Quality of life will be reduced due to increased noise and traffic congestion.

I also ask you to consider the legacy being created. At a time when the climate is changing, are we to ask caretakers of this planet to risk even greater amounts of carbon dioxide into the atmosphere?

Coal burned anywhere on this planet negatively impacts our health, quality of life in the U.S., and our children's futures.

Is our legacy to future generations to be one of significantly higher temperatures, increased wildfires, catastrophic storms, all of which are due to fossil fuel consumption, or will future generations look back at us as having the courage, common sense, and vision to reduce our use of fossil fuels?

Please consider the legacy that you are leaving and recommend no action. Thank you.

Ward, Rob (0054)

Submission Number: ***MBTL-SEPA-DEIS-0000054***

Received: 5/3/2016 2:52:35 PM
Commenter: Rob Ward
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality. Sincerely, Rob Ward

Submission Number: ***MBTL-SEPA-DEIS-0001577***

Received: 5/31/2016 5:21:39 PM
Commenter: Steven Ward
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Submission Number: ***MBTL-SEPA-DEIS-0000402***

Received: 5/17/2016 6:20:41 PM
Commenter: Sue Ward
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it’s time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide.

Submission Number: ***MBTL-SEPA-DEIS-0002824***

Received: 6/13/2016 2:38:00 PM
Commenter: Timothy Ward
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

From: <Saved by Windows Internet Explorer 8>
Subject: **BNSF - Customers - What I Can Ship - Coal - Coal Dust FAQs**
Date: March 2, 2011 3:10:11 PM PST

Coal Dust Frequently Asked Questions

- Why is BNSF establishing coal dust emission standards?
- How extensive is the coal dust problem?
- BNSF has been shipping coal from the PRB for decades - why is this coming up now?
- What are the coal dust standards?
- When will the standards become effective?
- What basis does BNSF have for the specific coal dust standards that BNSF has adopted?
- Why shouldn't the railroad be responsible for dealing with the coal dust problem instead of coal shippers and coal mines?
- Why can't BNSF deal with the coal dust problem through increased maintenance?
- Could the coal dust problem be related to rapid discharge gates at the bottom of the cars?
- Are there other possible sources of dust or contaminants in the rail ballast?
- What types of remediation measures are available to meet BNSF's coal dust standards?
- Have any of these remedial measures ever been used before?
- How do you know that these measures would be effective in meeting BNSF's standards?
- Does the application of a surfactant require large quantities of water?
- If a surfactant is used, where should the surfactant be applied?
- Will all PRB coal shippers be subject to coal dust emission standards?
- What will happen if a shipper's trains do not meet the coal dust emission standards?
- Does BNSF intend to establish coal dust emission standards outside of the PRB?
- What information about coal dust emissions on particular trains is BNSF providing shippers?

Why is BNSF establishing coal dust emission standards?

BNSF has established coal dust emission standards to ensure the reliability, efficiency and safety of coal transportation out of the Powder River Basin (PRB). BNSF has determined that coal dust escaping from loaded coal cars can foul the ballast along rail lines and can lead to weakened track structure. Coal dust deposits have even caused fires in areas where coal dust has accumulated. BNSF is seeking to promote the uninterrupted flow of coal from the mines in the PRB to coal-fired electric generating stations and to avoid safety hazards, congestion and delays that can result from compromised rail infrastructure.



Joint Line - MP 69
Enlarge



Joint Line - MP 29
Enlarge

Top

How extensive is the coal dust problem?

The amount of coal dust that escapes from PRB coal trains is surprisingly large. While the amount of coal dust that escapes from a particular coal car depends on a number of factors, including the weather, BNSF has done studies indicating that from 500 lbs to a ton of coal can escape from a single loaded coal car. Other reports have indicated that as much as 3% of the coal loaded into a coal car can be lost in transit. In many areas, a thick layer of black coal dust can be observed along the railroad right of way and in between the tracks. Given the high volume of loaded coal trains that move each day in the PRB, large amounts of coal dust accumulate rapidly along the PRB rail lines.


Undercutting ballast tailings
Enlarge


Note coal dust accumulation alongside track
Enlarge

BNSF has been shipping coal from the PRB for decades - why is this coming up now?

The volume of coal transported out of the PRB over the Joint Line by BNSF and UP has increased substantially during this decade. As many as 88 loaded coal trains move out of the PRB in a single day. As PRB coal traffic expanded, the amount of coal dust deposited along the railroad right of way increased to levels that adversely affected PRB coal train operations. In May 2005, there were two significant derailments of coal trains in the PRB within a short period of time, resulting in significant disruption in service and congestion. BNSF determined that the derailments resulted from weakened track structure caused primarily by a combination of coal dust and high levels of rainfall along with other factors. Following the derailments, BNSF undertook extensive efforts to study the scope of the coal dust problem and to identify emission standards that would minimize the accumulation of coal dust on the roadbed. Those efforts resulted in coal dust emission standards that BNSF has established for coal trains operating on the Joint Line and on BNSF's Black Hills subdivision.


Note coal dust deposit in ballast drainage area
Enlarge


What is below ballast when you "scratch the surface"
Enlarge

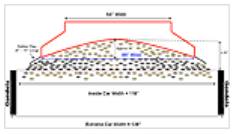

Coal dust in ballast section
Enlarge

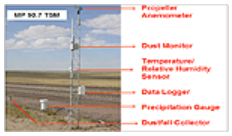
Top

What are the coal dust standards?

BNSF's coal dust emission standards are contained in Items 100 and 101 of BNSF's Coal Rules publication called Price List 6041-B. The standards require that coal cars must be loaded in conformance with a specified loading template. The new coal loading profile produces a more rounded contour of the coal in coal cars that eliminates the sharp angles and irregular surfaces that can promote the loss of coal dust when cars are in transit.

BNSF's coal dust emission standards also provide that the amount of coal dust emitted from a train may not exceed specified levels as measured by trackside monitors (TSM) at two locations on PRB lines. One TSM is located at milepost 90.7 on the Joint Line and the other TSM is located at milepost 558.2 on BNSF's Black Hills subdivision. A third trackside monitoring station has been constructed on the Big Horn subdivision and is fully operational.


Load Profile Requirements
Enlarge



Trackside Monitor (TSM)
Enlarge

When will the standards become effective?

BNSF issued Items 100 and 101 of its Price List 6041-B on May 27, 2009. The requirement in those Items that coal trains meet specific IDV.2 (Integrated Dust Value) limits was originally set to become effective on November 1, 2009. However, in late October 2009, BNSF notified its shippers that it was suspending the effective date of the IDV.2 limits until August 1, 2010 to give the Surface Transportation Board an opportunity to review and affirm the reasonableness of BNSF's coal dust emission standards and to give PRB coal shippers additional time to evaluate alternative means of complying with the standards. BNSF also announced in late October 2009 that it was undertaking a large-scale trial of coal dust mitigation measures so that shippers can obtain more information on the effectiveness of various mitigation measures. BNSF hopes and expects that its suspension of the effective date of the coal dust emission standards and the initiation of a new trial of coal dust mitigation measures will promote voluntary compliance with BNSF's coal dust standards.

What basis does BNSF have for the specific coal dust standards that BNSF has adopted?

BNSF has been conducting scientific studies of coal dust for several years. Among other things, the studies have involved collecting and analyzing data on coal dust emissions from thousands of trains. BNSF has retained and worked closely with engineering consultants to design monitoring devices for coal dust emissions, to implement protocols for measuring coal dust emissions from particular trains, and to analyze the results of field tests. With its outside consultants, BNSF has determined that limiting coal dust emissions to the IDV.2 levels specified in Items 100 and 101 would reduce coal dust emission levels by about 85%.

Why shouldn't the railroad be responsible for dealing with the coal dust problem instead of coal shippers and coal mines?

BNSF does not believe that any shipper's commodity that is transported by BNSF should be permitted to escape from the shipping container and foul the railroad's roadbed or surrounding areas. Coal shippers are no different from other shippers who are responsible for securing their freight for transit by rail.

Top

Why can't BNSF deal with the coal dust problem through increased maintenance?

Cleaning up coal dust after it has escaped from the coal cars in transit is not an acceptable alternative to taking preventive measures to reduce coal dust emissions. Routine maintenance procedures cannot address the structural problems caused by coal dust that accumulates along the rail lines. Extraordinary maintenance measures are required to deal with this problem. For example, BNSF has found that it must increase substantially the frequency of undercutting – where the ballast is removed, cleaned and replaced – to remove coal dust accumulations. In addition to the high costs of such operations, the increased maintenance activities can adversely affect service availability and reliability. Undercutting operations take rail lines out of service for protracted periods of time. This cuts back on line capacity that would otherwise be available for transporting coal and can lead to congestion and service restrictions.



Undercutter work

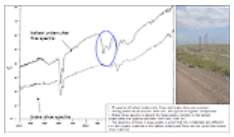
Enlarge

Could the coal dust problem be related to rapid discharge gates at the bottom of the cars?

BNSF has done studies over the past three years that have confirmed that while some coal leaks from rapid discharge gates on coal cars, the vast majority of coal dust that is deposited on the railroad right of way comes off of the top of loaded coal cars. BNSF therefore believes that proper maintenance of rapid discharge gates is an important opportunity to reduce the loss of coal in transit, but coal dust mitigation efforts must focus on reducing the level of coal dust emitted from the top of loaded coal cars.

Are there other possible sources of dust or contaminants in the rail ballast?

Organic chemistry and x-ray diffraction analysis confirm that the preponderance of material fouling the rail ballast is coal. Only minute amounts of brake shoe dust or diesel particulates have been found in the rail ballast.



Infrared spectra diagram

Enlarge

Top

What types of remediation measures are available to meet BNSF's coal dust standards?

A number of remediation measures are available to reduce coal dust emissions. In addition to the new

loading profile, chemical agents called surfactants can be sprayed over the loaded coal to keep the coal in place during transit and to reduce coal dust. Other products and services are being explored and developed. BNSF is confident that as coal shippers begin to implement remediation measures and search for the most cost-effective approaches, the market will respond with increasingly effective remediation technologies.

Have any of these remedial measures ever been used before?

Yes. Coal dust suppression measures have been used extensively in areas outside the PRB. The most common measure until now has been the application of a surfactant. Surfactants have been used for several years in Canada by the Canadian Pacific to reduce coal dust emissions. In the eastern United States, Norfolk Southern has used surfactants along with the grooming of loaded coal cars since the mid 1970's to limit coal dust emissions. Surfactants are increasingly being used in Australia.

How do you know that these measures would be effective in meeting BNSF's standards?

Since 2005, BNSF has been conducting studies in the PRB of coal dust emissions and various measures available to reduce those emissions. These studies have confirmed that the use of surfactants can reduce coal dust emissions to the IDV.2 levels set out in BNSF's coal dust emission standards. In addition, BNSF announced in late October 2009 that that it was undertaking a large-scale trial of coal dust mitigation measures so that shippers can obtain more information on the effectiveness of various mitigation measures. The trial will involve participation by chemical vendors as well as several mines and coal shippers. Different chemical surfactants will be tested in the laboratory and in the field on operating coal trains to determine the effectiveness of different products and services in reducing coal dust emissions. The results will be reported to the test participants. BNSF hopes that this trial will assist coal shippers and their mine agents to identify effective dust suppression measures.



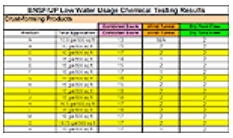
Excerpt of 2010 trial test plan

Enlarge

Top

Does the application of a surfactant require large quantities of water?

Several different chemical agents are available for use as a surfactant to reduce coal dust emissions. Among these products are low-water surfactants.



Low Water Chemicals

Enlarge

If a surfactant is used, where should the surfactant be applied?

It is not feasible for BNSF to apply a surfactant while the loaded coal train is on rail property. Stopping loaded coal trains on the rail property would disrupt operations on the high volume PRB coal lines and could have a serious adverse impact on the reliability and efficiency of PRB operations. The most efficient and effective place to apply the surfactant is at the mine immediately after loading of coal into the rail car.

Will all PRB coal shippers be subject to coal dust emission standards?

Yes. BNSF is the operator of the Joint Line and is responsible for establishing operating rules that apply to all trains operating on the Joint Line. The coal dust emission standards set out in Item 100 and Item 101 of BNSF's Coal Rules publication referred to as Price List 6041-B have been issued as operating rules applicable to all trains operating on the Joint Line and on the Black Hills subdivision. BNSF anticipates establishing in the near future coal dust emission standards for coal trains operating over BNSF's Big Horn subdivision.

Top

What will happen if a shipper's trains do not meet the coal dust emission standards?

BNSF is hopeful and expects that shippers will comply with the standards and will further address any specific implementation steps as needed.

Does BNSF intend to establish coal dust emission standards outside of the PRB?

In addition to coal dust emission standards applicable to trains operating on the Joint Line, BNSF has established coal dust emission standards applicable to coal trains originating in the PRB and operating over BNSF's Black Hills subdivision. BNSF anticipates setting standards applicable to coal trains originating in the PRB and operating on the Big Horn subdivision in the near future. In addition, BNSF is continuing to study the impact of coal dust emissions in areas outside of the PRB.

What information about coal dust emissions on particular trains is BNSF providing shippers?

Since January 2009, shippers whose trains operate over the Joint Line and over BNSF's Black Hills subdivision have been receiving monthly reports on trains that exceed the coal dust emission levels specified in Items 100 and 101 of BNSF's Price List 6041-B. In addition, BNSF conducts random field audits of the loading profiles of coal cars and provides information to shippers and mines on cars that have a loading profile that deviates from the profile described in BNSF's coal dust emission standards.

Top

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Washington State

2010-2030
Freight Rail Plan





December 2009

Washington State
Department of Transportation

For more information, contact:

- Call the WSDOT State Rail and Marine Office at (360) 705-7900;
- Write to the WSDOT State Rail and Marine Office at P.O. Box 47407, Olympia, WA 98504-7407;
- Fax your comments to (360) 705-6821; or
- E-mail your comments to rail@wsdot.wa.gov



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Washington State 2010-2030 Freight Rail Plan

Prepared by

Washington State Department of Transportation
State Rail and Marine Office

December 2009



Washington State Department of Transportation

Washington State Department of Transportation
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Washington State requires a robust rail system that will provide effective and efficient transportation critical to maintaining our economy, environment and quality of life. Our vision for the future is to enhance our economic vitality and mobility while safeguarding the environment, by continually improving our transportation system.

The *Washington State 2010-2030 Freight Rail Plan* is an update of the *Washington State Freight Rail Plan 1998 Update*. This plan will provide guidance for rail initiatives and investments in Washington State that will:

- Support Washington's economic competitiveness and economic viability.
- Preserve the ability of Washington's freight rail system to efficiently serve the needs of its customers.
- Facilitate freight system capacity increases to improve mobility and reduce congestion.
- Take advantage of freight rail's modal energy efficiency to reduce the negative environmental impact of freight movement in Washington.

The Washington State Freight Rail Plan complies with the Federal Railroad Administration (FRA) requirements that the state establishes, updates, and revises a rail plan in order to receive federal assistance. The Freight Rail Plan also fulfills state requirements, under the Revised Code of Washington (RCW) 47.76.220 and RCW 47.06.080, that the Washington State Department of Transportation (WSDOT) prepare and periodically revise a state rail plan that identifies, evaluates, and encourages essential rail services.

This plan is a product of broad participation from rail industries, ports, shippers, local entities, tribes, transportation communities, interest groups, and the general public. It develops the vision, goals, and strategies to provide reliable, accessible, cost-effective, energy efficient and environmentally friendly freight rail services. It presents a compilation of statewide freight rail needs. Currently a National Rail Policy is being developed by the FRA and is anticipated to be released in 2010. Washington's plan will be updated and revised as necessary to maintain consistency with the National Rail Plan.

The Washington State Freight Rail Plan is intended to serve as a blueprint for investment in our rail system and to prepare us to capture the emerging opportunities from economic recovery that is on the horizon. With effective and responsible improvements to our rail system we will serve the economic development, transportation, social and environmental goals of Washington State and its citizens.

Paula J. Hammond, P.E.
Secretary of Transportation

Washington State Department of Transportation

Table of Contents

Executive Summary

Introduction....ES-1
2030 Vision for Freight Rail in Washington State....ES-2
Rail Infrastructure Needs and Investment Program....ES-8
Preservation of At-Risk Railroads....ES-8
Freight System Issues and Needs....ES-14
Statewide Information and Data Needs....ES-17
The Partners....ES-18
Investment Prioritization and Project Evaluation....ES-18
Financing the Needs....ES-19
State Role....ES-19
Conclusion....ES-20

Chapter 1: Plan Purpose and Authority

Purpose of the State Freight Rail Plan....1-1
Washington State Department of Transportation....1-1
WSDOT's State Rail and Marine Office....1-1
State and Federal Legislative and Planning Requirements....1-2
Development of the State Freight Rail Plan....1-4
Plan Organization....1-9

Chapter 2: State Rail Vision

Introduction....2-1
Macroeconomic Environment....2-3
Changes in Transportation....2-4
Vision of Rail Transportation in Washington State....2-9
Goals, Objectives, Strategies, and Actions....2-9
Conclusion....2-16

Chapter 3: Rail System and Freight Rail Services in Washington State

Overview of Washington State Rail System Services....3-1
Washington State Freight Rail System Profiles....3-5
Capacity of the Washington State Rail System....3-20
Recent Major Policy Changes Impacting the Rail System in Washington State....3-29

Chapter 4: Freight Rail Services – Effects on the Economy and Society

Functions of Freight in Washington's Economy 4-1
Freight Rail in Washington's Economy 4-2
Major Drivers in Freight Rail Demand 4-13
Future Demand – Washington State Rail Forecast 4-18

Chapter 5: The Changing Rail System – Issue Discussion and Needs Assessment

Overview of Issues and Needs Assessment 5-1
Rail Abandonments: Recent, Proposed, and At-Risk Lines 5-3
Port Access 5-10
Intermodal Connectors 5-16
Rail Freight System Issues and Needs 5-20
New Services 5-29
Emerging Issues 5-29
Summary 5-44

Chapter 6: State Roles and Partners

Washington State's Current Roles 6-1
Washington's Strategic Partners 6-6
Strategic Planning 6-10
Future Roles 6-12
Continued Statewide Coordination and Partnerships 6-14
Conclusion 6-15

Chapter 7: Investment Prioritizing and Project Evaluation

Public and Private Benefits 7-1
Freight Rail Investment Analysis in Washington State 7-3
Rail Benefit/Impact Evaluation Methodology – Description 7-11
Limitations and Future Improvements 7-16

Chapter 8: Financing Washington's Freight Rail System

Needs for Investment 8-1
Funding for Freight Rail 8-10
Current Funding Sources 8-14
Strategies 8-28
Vision for Future Funding 8-30
Summary 8-32

Warner, Allison (3426)

Chapter 9: Challenges and Opportunities

Transportation Challenges 9-1
Transportation Opportunities: Implementation of the Plan 9-3
Conclusion 9-7

List of Exhibits

Exhibit ES-1: Washington State Rail Map ES-4
Exhibit ES-2: Washington State Rail Freight Directional Flows - 2007 ..... ES-5
Exhibit ES-3: Top 10 Commodities Shipped by Rail Washington State 2007 ..... ES-6
Exhibit ES-4: Freight-Dependent Sectors Employment Washington State 2008 First Quarter ES-7
Exhibit ES-5: Greenhouse Gas Emissions by Mode ES-7
Exhibit ES-6: Washington Rail Investments ES-9
Exhibit ES-7: Ports of Washington State ES-11
Exhibit ES-8: Intermodal Freight Connectors in Washington State ES-13
Exhibit 2-1: Washington 2005 GHG Emissions 2-6
Exhibit 2-2: Greenhouse Gas Emissions by Mode 2-7
Exhibit 3-1: Washington State Rail System 3-2
Exhibit 3-2: Washington State Rail Freight 1991 to 2007 3-4
Exhibit 3-3: Rail Freight Flows in Washington State – 2007 3-5
Exhibit 3-4: Freight Rail Intermodal Traffic – Washington State 2007 3-5
Exhibit 3-5: Washington Freight Railroads, Mileage, and Class 3-7
Exhibit 3-6: Rail Service Corridors in Washington State 3-8
Exhibit 3-7: Rail Intermodal Facilities in Washington State 3-15
Exhibit 3-8: Railroad Terminals and Yards Impacting Washington State Rail Movements 3-16
Exhibit 3-9: 2008 Rail Line Capacity 3-21
Exhibit 3-10: 2028 Rail Line Capacity 3-22
Exhibit 3-11: Railroad Bottlenecks 3-23
Exhibit 3-12: Rail Lines in Washington State Exceeding Practical Capacity 2008 and 2028 3-28
Exhibit 4-1: Washington State Is a Global Gateway 4-2
Exhibit 4-2: Freight-Dependent Sectors GDP Washington State 2008 4-3
Exhibit 4-3: Business Incomes of Freight-Dependent Sectors Washington State 2008 4-3
Exhibit 4-4: Freight-Dependent Sectors Employment Washington State 2008 First Quarter 4-4
Exhibit 4-5: Freight by Mode – Washington State 2007 4-4
Exhibit 4-6: Rail Freight Flows – Washington State 2007 4-5

Warner, Allison (3426)

Exhibit 4-7: Growth of Rail Freight Flows Washington State 2007 versus 1996 4-5
Exhibit 4-8: Directional Rail Freight Flows Average of Other States in U.S. 2007 4-6
Exhibit 4-9: Top 10 Commodities Shipped by Rail Washington State 2007 4-7
Exhibit 4-10: Inbound Rail Freight Flows 4-8
Exhibit 4-11: Outbound Rail Freight Flows 4-9
Exhibit 4-12: Economic Output and Employment Supported by Produce Rail Car Program – Year 2008 4-10
Exhibit 4-13: Economic Impacts of Freight Rail Transportation – Washington State 2007 4-14
Exhibit 4-14: Population Growth – Washington State 2007-2030 4-15
Exhibit 4-15: U.S. Export and Import, 1992 to 2008 4-15
Exhibit 4-16: Top Ten Export States in the United States – 2008 4-16
Exhibit 4-17: Container Traffic Through Puget Sound Ports 1998-2008 4-16
Exhibit 4-18: GDP Growth of Freight-Dependent Sectors – Washington State vs. United States, 1997 to 2008 4-17
Exhibit 4-19: GDP Growth by Freight-Dependent Sectors – Washington State 1997 to 2008 4-18
Exhibit 4-20: Washington State Rail Freight 2007, 2020, and 2030 4-20
Exhibit 4-21: Rail Freight Distribution 4-20
Exhibit 4-22: Projected Rail Freight Growth of Top 10 Commodities – Washington 2007-2030 4-21
Exhibit 4-23: Marine Cargo Trends – Rail vs. Other Modes 2002 to 2030 4-22
Exhibit 4-24: Marine Cargo Port Modal Distribution Washington State 2007, 2020, and 2030 4-23
Exhibit 4-25: U.S. Shipments by Mode – 2006 and 2035 4-25
Exhibit 4-26: U.S. Freight Tons and Value by Mode, 2006 and 2035 4-25
Exhibit 4-27: Comparison of Total Rail Flow Railcars per Year – 2005 and 2035 4-28
Exhibit 4-28: Principle of With/Without Analysis 4-29
Exhibit 5-1: Procedure for Collecting Freight Rail Needs 5-3
Exhibit 5-2: Abandoned Rail Lines 5-4
Exhibit 5-3: Washington Rail Investments 5-5
Exhibit 5-4: Abandonment Survey List – Likely Abandonments 5-7
Exhibit 5-5: Palouse River and Coulee City Rail System 5-8
Exhibit 5-6: Washington State Ports 5-11
Exhibit 5-7: Seattle Freight Network 5-18
Exhibit 5-8: Tacoma Freight Network 5-19
Exhibit 5-9: All Intermodal Freight Connectors in Washington State 5-21

Warner, Allison (3426)

Exhibit 5-10: All Intermodal Freight Connectors in the Puget Sound Region 5-22
Exhibit 5-11: Rail Intermodal Freight Connectors in Washington State 5-23
Exhibit 6-1: Regional and Metropolitan Transportation Planning Organizations 6-8
Exhibit 7-1: Federal Requirements for Benefit Assessment and Documentation 7-2
Exhibit 7-2: Variables for the State Benefit/Cost Analysis 7-4
Exhibit 7-3: Benefit and Cost Measures 7-5
Exhibit 7-4: PRIIA-Defined Benefits and Evaluation Strategies 7-7
Exhibit 7-5: Possible Methodology to Measure Public Benefit in Washington State 7-10
Exhibit 7-6: Benefit Impact Evaluation Process 7-15
Exhibit 8-1: Needs Identification Process 8-2
Exhibit 8-2: Survey Respondents 8-4
Exhibit 8-3: Estimated Completion Dates 8-4
Exhibit 8-4: Project Types 8-5
Exhibit 8-5: Public Benefits 8-6
Exhibit 8-6: Private Benefits 8-6
Exhibit 8-7: Funding Needs by Commitment 8-7
Exhibit 8-8: Committed Funds by Source 8-8
Exhibit 8-9: Expected Funds by Source 8-9
Exhibit 8-10: Funding Needs by Area 8-9
Exhibit 8-11: Funding Needs by Phase 8-10
Exhibit 8-12: Governmental Transportation Expenditure by Mode 8-11

Washington State Department of Transportation

Executive Summary

Introduction

Washington State's (state) economy needs a vibrant, competitive rail network. This network must provide a reliable, accessible, and cost-effective freight service to shippers and customers across the state. At the same time, the freight rail system must co-exist with a high-quality, fast, frequent and reliable passenger rail service between major cities across the state that is competitive with automobile and air travel times. This plan focuses on the freight side of this equation. It must be recognized that both systems are interconnected and must be planned accordingly to meet both freight and passenger needs as an integrated rail network.

The future of the state freight rail system is envisioned by the State Freight Rail Plan Advisory Committee to meet the following six goals:

- **Economic Competitiveness and Viability:** Support the state's economic competitiveness and economic viability through strategic freight partnerships.
- **Preservation**: Preserve the ability of the state's freight rail system to efficiently serve the needs of its customers as well as preserve the potential of the system in the future.
- **Capacity**: Coordinate the freight rail system capacity increases to improve mobility, reduce congestion, and meet the growing needs of the state's freight rail users, when economically justified.
- **Energy Efficiency and Environmental**: Take advantage of freight rail's modal energy efficiency to reduce the negative environmental impacts of freight movement in the state.
- **Safety and Security**: Address the safety and security of the freight rail system and make enhancements, where appropriate.
- **Livability**: Encourage livable communities and family-wage jobs through the freight rail system and its improvements.

The *Washington State 2010-2030 Freight Rail Plan* is an update of the *Washington State Freight Rail Plan 1998 Update*. This update complies with Federal Railroad Administration (FRA) requirements that the state establishes, updates, and revises a rail plan in order to receive federal assistance. The freight rail plan also fulfills state requirements, under Revised Code of Washington (RCW) 47.76.220 and RCW 47.06.080, that the Washington State Department of Transportation (WSDOT) prepare and periodically revise a state rail plan that identifies, evaluates, and encourages essential rail services. This plan and its recommendations are

intended to be a living document that will be updated and revised as future conditions require. Currently a National Rail Policy is being developed by the FRA and is anticipated to be released in 2010. Washington's plan will be updated if a revision is required to maintain consistency with the National Rail Plan.

This plan will provide guidance for rail initiatives and investments in the state. Results from this plan will be included in the *Statewide Multimodal Transportation Plan*. WSDOT intends this next update to meet state and federal transportation planning requirements, thus maintaining the state's eligibility to receive federal surface transportation funding.

The freight rail plan also reflects strategies to:

- Increase the effectiveness of the rail program.
- Broaden understanding of rail issues for all stakeholders.
- Provide a framework to implement rail initiatives in the state.
- Support WSDOT in federal funding opportunities, such as Transportation Investment Generating Economic Recovery and American Recovery and Reinvestment Act of 2009 (ARRA).
- Implement the rail benefit/cost analysis required by the legislature.
- Fulfill new federal requirements for state rail plans.

2030 Vision for Freight Rail in Washington State

The Washington State freight rail system is:

- ***Reliable.***
- ***Cost effective.***
- ***Energy efficient.***
- ***Environmentally-friendly transportation mode for domestic and international cargo deliveries.***

As a critical part of Washington's multimodal transportation system, the rail system leverages intermodal connections:

- ***To provide a seamless system for cargo deliveries to customers.***
- ***To improve the mobility of people and goods.***
- ***To support Washington's economy by creating and sustaining family-wage jobs and livable communities.***

Freight rail has increasing importance that fosters economic growth and livable communities for the state and its citizens. The rail system is a critical part of the multimodal transportation system that supports national and international trade flows through the state and provides critical gateway opportunities for other cargo to move through the state. It is a vital system that supports state ports and the regional economies bringing

state goods to national and international markets. Freight rail in the state can be considered as a fundamental utility supporting the retail and wholesale distribution system.

Rail System in Washington State

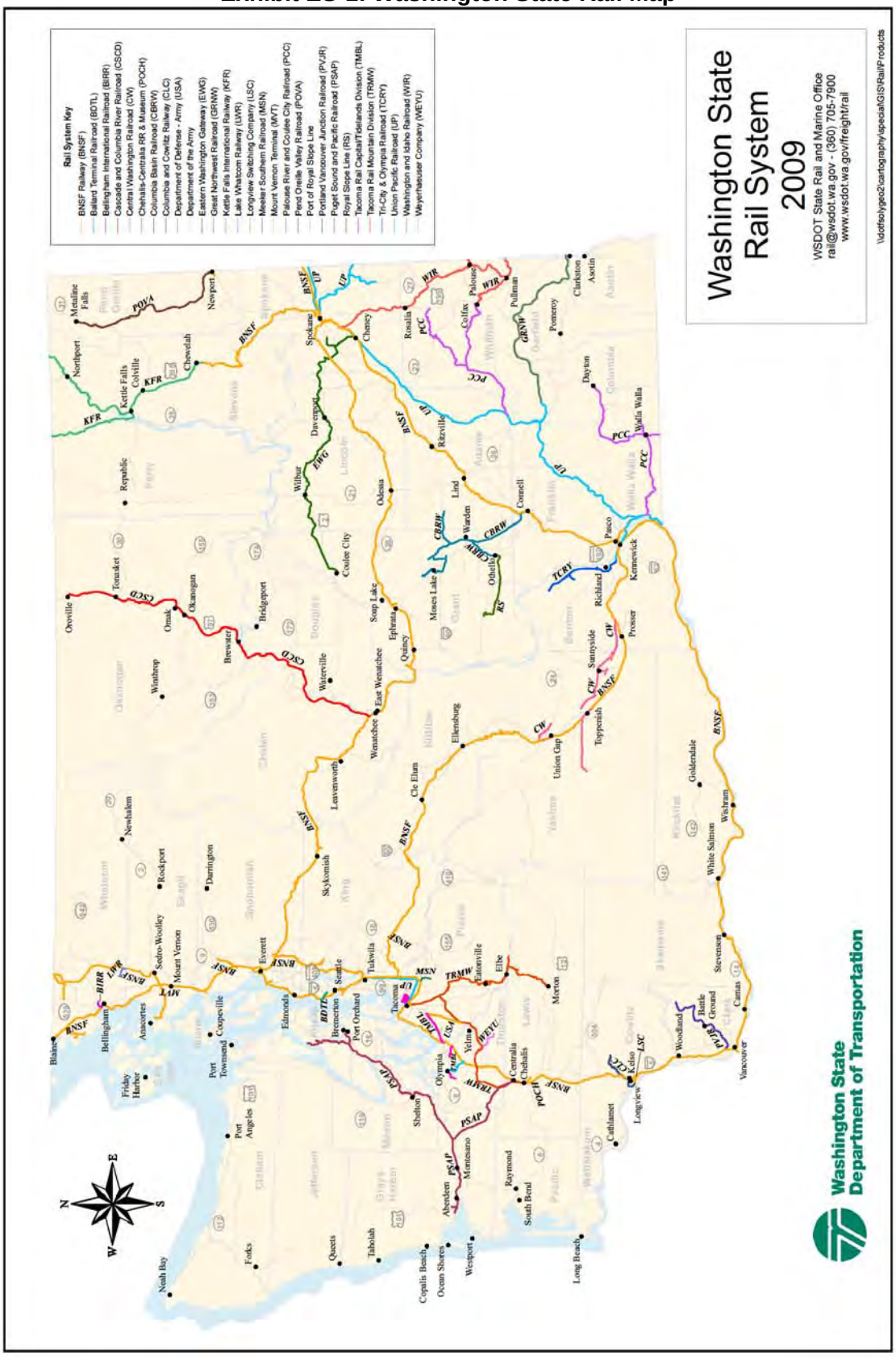
The state's rail network has evolved over the last century to serve a wide range of passenger and freight markets and has extended across many parts of the state. Thirty-two of the state's 39 counties are served by one of the state's freight railroads (Exhibit ES-1). The rail network in the state has three distinct types of rail services: intercity passenger, commuter, and freight.

The Class I railroad system primarily serves the inland transportation component of the supply chain for large volumes of import and export cargo moving through state ports. This Class I railroad system is supported locally by the short-line network consisting of many small railroads, many of which evolved from abandonments of the Class I railroads.

The state's mainline railroad system is comprised of two Class I railroads: the BNSF Railway (BNSF) and the Union Pacific Railroad (UP). Both operators have invested in improvements and upgrades to their rail systems, including new locomotives, new traffic control systems, and rolling stock substantial infrastructure improvements. The Class I railroads are supported by one Class II and 19 active Class III short-line railroads. This brings the total number of active freight railroads in the state to 22.

There are three major rail corridors in the state. First, the north-south corridor is the I-5 rail corridor running from Portland, Oregon (OR) to Vancouver, British Columbia (B.C.). There are two east-west corridors: the Columbia River Gorge—running from Vancouver, Washington (WA) to the east—and Stevens Pass running from Everett to Spokane. These three corridors carry the majority of the current freight rail volumes and are supported by other less dense mainline routes as well as the short lines that feed into the mainlines, such as Stampede Pass running from Auburn to Pasco.

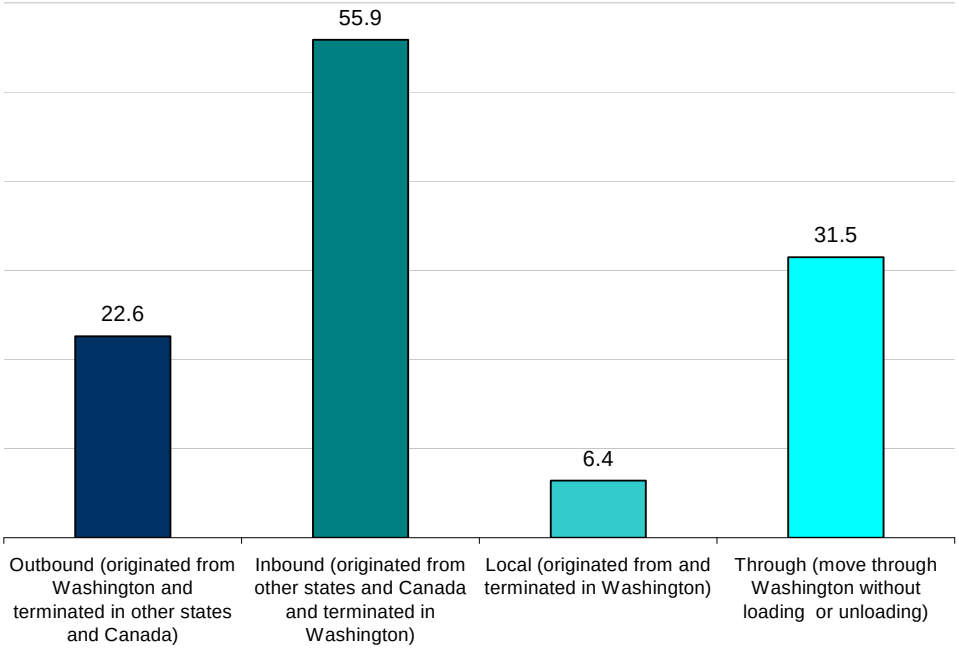
Exhibit ES-1: Washington State Rail Map



Economic Impact

Freight rail transportation is a fast growing service. In 2007 the state rail system carried 116 million tons of freight, compared with 64 million tons in 1991, for an annual growth rate of 3.8 percent. Among the 116 million tons of rail freight, 56 million tons arrived in the state from 44 other states and Canada, while almost 23 million tons were shipped from the state ports and industries to 46 other states and Canada. Over 6 million tons of local rail freight moved within state borders and Almost 32 million tons of rail freight moved through the state without loading and unloading (Exhibit ES-2).

Exhibit ES-2: Washington State Rail Freight Directional Flows – 2007
(Million Tons)



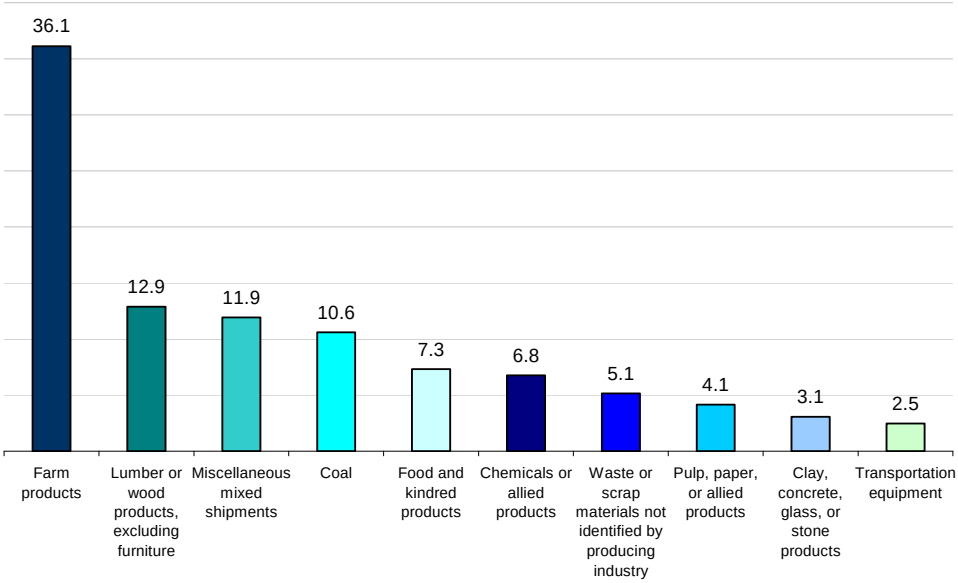
Source: WSDOT State Rail and Marine Office – 2007 Surface Transportation Board (STB) Waybill Sample Data Analysis

The economic vitality of the state requires a robust rail system capable of providing its businesses, ports, and farms with competitive access to North American and overseas international markets. The state is well known for its agricultural products, such as apples, wheat, fruit, and potatoes. Freight rail plays an important role to underpin the state's agriculture sector. Lumber and wood product producers, manufacturers, waste management, and mining also rely on rail transportation to move heavy, bulky products to markets in a cost-effective manner.

Farm products (36.1 million tons) were the top commodity by weight moved on the state's rail system, followed by lumber and wood

(12.9 million tons), miscellaneous mixed shipments (11.9 million tons), and coal (10.6 million tons) (Exhibit ES-3). In 2007, 86 percent of the freight moved on state rail lines was from the top ten commodities.

Exhibit ES-3: Top 10 Commodities Shipped by Rail
Washington State 2007 (Million Tons)



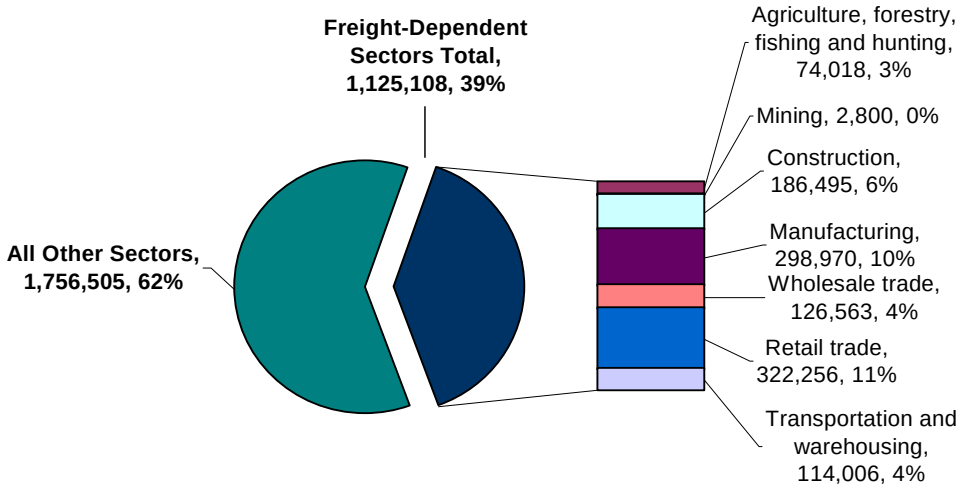
Source: WSDOT State Rail and Marine Office – 2007 STB Waybill Sample Data Analysis

Rail freight transportation has significant economic impacts. In 2007 total rail freight revenue, including rail only and rail intermodal, amounted to $1.2 billion.[1] Freight rail employed 4,207 people in the state and contributed $533 million directly to the state's Gross Domestic Product (GDP).

A large part of the state's economy depends on freight for its competitiveness and growth. The state's freight rail system, as an integrated part, also supports freight-dependent sectors of the economy. Freight-dependent sectors, in general, include agriculture, mining, construction, manufacturing, wholesale, retail, transportation, and warehousing. In 2008 freight-dependent sectors accounted for 33 percent of the state's GDP, 71 percent of business income, and 39 percent of state's employment (Exhibit ES-4).

[1] Rail intermodal refers to double-stack container trains that move as a unit train and has one or more modes to move a shipment from origin to destination.

Exhibit ES-4: Freight-Dependent Sectors Employment
Washington State 2008 First Quarter
Freight-Dependent Sectors: 1.125 Million Jobs
All Sectors: 2.881 Million Jobs



Source: Washington State Employment Security Department 2008, compiled by WSDOT State Rail and Marine Office

Societal Impact

Transportation is one of the largest greenhouse gases (GHG) sources in the state. Transportation GHG sources includes light- and heavy-duty (on-road) vehicles, aircraft, rail engines, and marine engines. Carbon dioxide (CO_2) accounts for about 98 percent of transportation GHG emissions from fuel use. Most of the remaining GHG emissions from the transportation sector are due to nitrogen oxide (NOx) emissions from gasoline engines. Rail is a more environmentally-friendly transportation mode (Exhibit ES-5). Increasing the use of rail transportation can contribute to a reduction in GHG.

Exhibit ES-5: Greenhouse Gas Emissions by Mode
(grams/ton-mile)

	Road	Rail	Air
Carbon Dioxide (CO_2)	235.33	40.00	1,469.33
Nitrogen Oxide (NOx)	1.99	0.74	6.31
Particulate Matter (PM_{10})	0.47	0.05	0.80
Carbon Monoxide (CO)	1.21	0.42	6.26
Sulfur Dioxide (SO_2)	0.30	0.12	2.27

Source: Environmental Science Technology, 2007, 41, 7138-7144

Publicly- and privately-owned railroads are implementing cleaner fuels and working to achieve increased fuel efficiency by retrofitting existing

engines and purchasing newer cleaner engine technologies on new equipment, as well as continuing to make operational efficiency improvements.[2]

Increasing the use of rail for both the movement of freight and passengers can help the state make progress towards its GHG emissions reduction goals. On a national level, freight demand is projected to almost double in the next 35 years. Without improvements in freight rail capacity, this increase in demand would need to be accommodated by trucks using the roadway network.

In the case of moving freight from trucks to trains, a net decrease in GHG emission reductions is tied to a permanent change in mode split: freight volumes are forecast to grow, and if trucks shift one commodity to rail simply to haul another commodity on the road, there will not be a net decrease in GHG emissions.

Rail Infrastructure Needs and Investment Program

Currently, the Class I railroads are meeting the existing long-haul traffic demands, but are experiencing capacity limitations during peak volumes on some of their routes. It must be noted that the majority of the state's passenger rail services run on rail owned by these Class I railroads. Thus, infrastructure improvements and operational changes will be needed to accommodate projected growth in freight and passenger traffic, and to support a competitive rail freight environment.

An assessment of the freight needs was completed as part of this plan. The assessment is based on data provided directly by the state's freight railroads, ports, public agencies, and other key stakeholders. In total, this needs assessment identifies 109 short- and long-term capital improvement projects and other initiatives. The total cost for the requested projects, where cost estimates are available, is $2.0 billion. Other issues that need to be considered in the development of this plan are: proposed rail abandonments and at-risk lines, port access, intermodal connectors, and emerging issues that face freight rail in this state. The state needs to develop a comprehensive system to prioritize these projects, using a cost benefit approach, to obtain the maximum benefit for the public's investment into any private infrastructure that is clearly measurable.

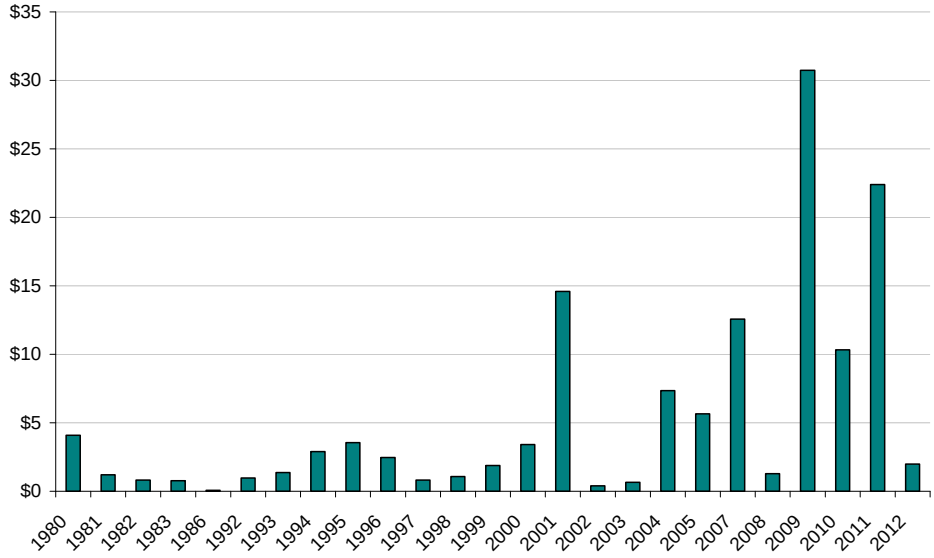
Preservation of At-Risk Railroads

The state has one of the best rail preservation and development programs in the country. The state has invested $99 million in its rail freight

[2] www.maritimeairforum.org/news/NW_Ports_Clean%C2%ADAirStrategy_Draft.pdf.

infrastructure since 1980. An additional $35 million in investment is anticipated from 2010 to 2012 (see Exhibit ES-6).

Exhibit ES-6: Washington Rail Investments (in Millions)



Source: WSDOT State Rail and Marine Office

These investments include the Freight Rail Assistance Program ($6 million 2007-2011), and Freight Rail Investment Bank Program (Rail Bank) loans. The Rail Bank has made $7.5 million in funding available from 2007-2011, with a maximum loan of $250,000. All of these investments have been in regional and small railroads, in recognition of the fact that these railroads are a vital component of the state's transportation system and economic well-being.

Port Access

Port access to rail is very important to the vitality of local, state, and national economies. As economic development agencies, ports are a fundamental part of the state's infrastructure. State ports face substantial competition from other ports and shipping routes. The majority of the cargo that comes through state ports is discretionary cargo (i.e., containers, autos, grain, dry bulks, and break-bulk cargoes) that can shift to other gateways, if shipping through these other ports becomes more efficient or cost effective than using state ports. To be competitive, ports must have good rail access[3] and connect effectively to the rest of the system. As an added benefit, rail is a community-friendly mode, as it is a safe, energy-efficient way to move goods along major corridors.

[3] Good rail access means that trains can get in and out of a rail facility without delay to the facility, the train, or other rail operations on a rail line.

The state has 75 ports, not all with water access, as shown in Exhibit ES-7. The state has 11 deep-draft ports, a tremendous asset for the state's economy.[4] This is an asset because these ports can berth most of the cargo ships on the ocean due to the ability to handle ships that draw up to 40 feet of draft. Seven of these ports are on the Puget Sound. The largest ports, the Ports of Seattle and Tacoma, together comprise the third largest container load center in the nation—behind the complexes at Los Angeles/Long Beach and New York/New Jersey. One deep-draft port, the Port of Grays Harbor, is located on the coast; and three are located on the Columbia River. Together, these ports comprise a seamless network that sends state goods to a global market, and imports goods from other countries, bound for state stores.

Vital to the continued success of state ports is capitalizing on our inherent competitive advantage—a shorter ocean trade route to the Asia/Pacific Rim through the state's gateways. However, if these critical gateways, which handle a majority of the state's freight rail tonnage, lead to a system that is slow and unreliable, they will be noncompetitive and the flow of trade may shift. This could result in added costs to shippers.

Thus, state ports are only a part of the freight rail picture. Each part of the system needs to contribute to the success of the whole. Investment of public dollars needs to follow a prioritized plan that will deliver the maximum system benefit.

The Columbia/Snake River Inland Waterway system stretches 365 miles inland from the Pacific Ocean. The three deep-draft ports along this system—Longview, Kalama, and Vancouver—are major shipping centers for the state. Upstream, the Ports of Klickitat, Pasco, Kennewick, and Benton are served by barge along the Columbia River. The Ports of Garfield, Whitman County, Walla Walla, and Clarkston are served by barge along the Snake River.

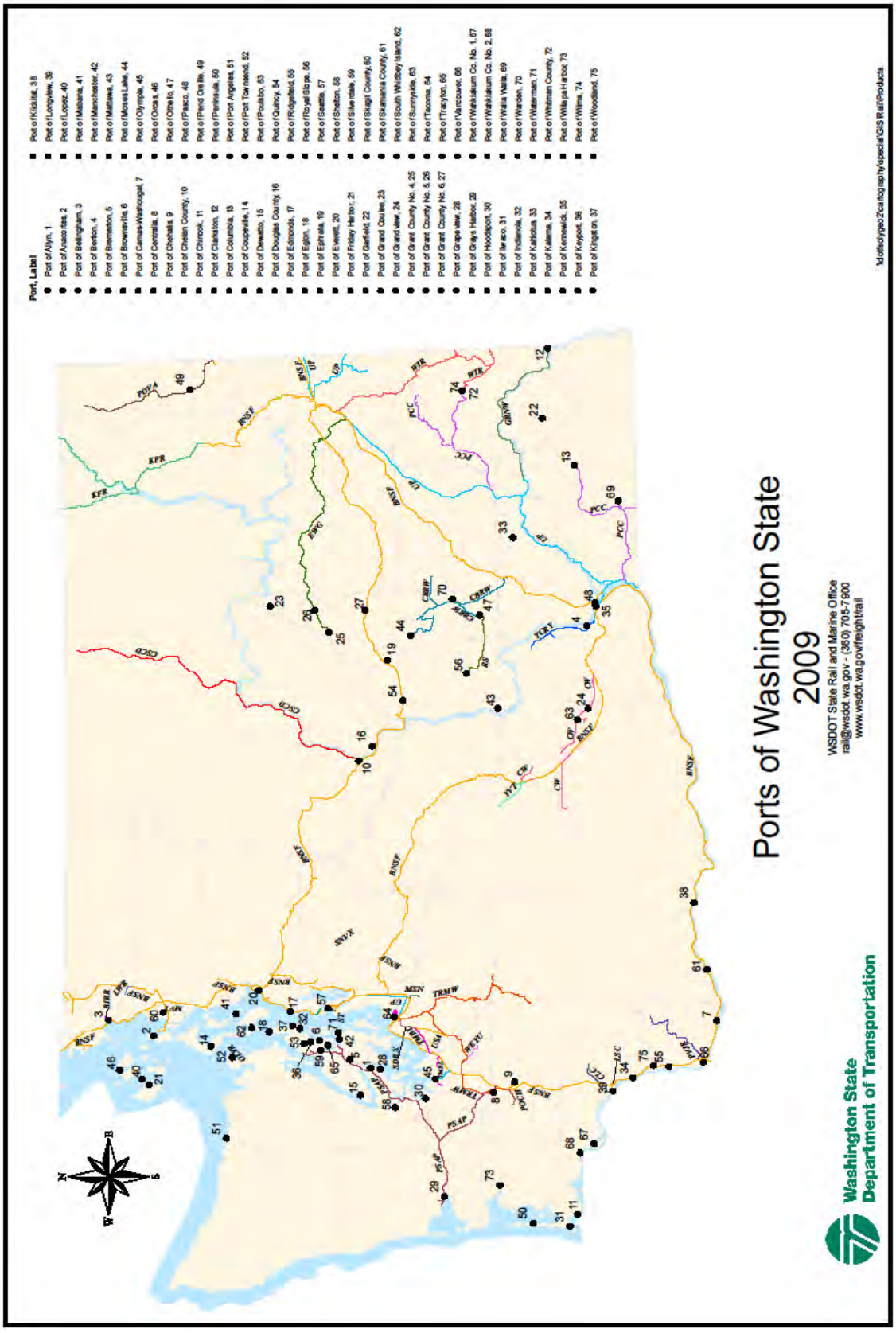
Although there are many ways to classify ports in the state, this plan has selected four classifications for ports that are rail served:

- **Intermodal (Container) Ports[5] –** Seattle and Tacoma.

[4] A deep draft Port is a port that can receive a ship with a laden draught of 40 feet or less. A very deep draft port is one that can handle a laden draught of 45 feet or less, which are most container ships and other large ships including military ships. http://www.globalsecurity.org/military/systems/ship/container-types.htm/.

[5] Intermodal ports are those ports that move containers from ship to rail, producing unit trains of containers to be transported to the inland destinations.

Exhibit ES-7: Ports of Washington State



- **Agricultural and Bulk Ports –** Clarkston, Garfield, Grays Harbor, Longview, Kalama, Seattle, Tacoma, Vancouver (WA), Walla Walla, and Whitman County.
- **Rail-Dependent Break-Bulk and Industrial Ports –** Anacortes, Everett, Garfield, Grays Harbor, Kalama, Longview, Olympia, Seattle, Tacoma, and Vancouver (WA).
- **Rail-Serviced Industrial Ports –** Benton, Bremerton, Chelan, Clarkston, Columbia, Ephrata, Garfield, Kennewick, Mattawa, Moses Lake, Othello, Pasco, Quincy, Ridgefield, Royal Slope, Shelton, Sunnyside, and Whitman County 3 & 4.

Each of these categories has different access needs and challenges, although efficient and timely rail service is mandatory to all these ports. Port access issues are more closely related to location than to type of port.

Nearly all of the state's deepwater ports are located adjacent to the Interstate 5 (I-5) corridor, or are on short-line railroads that branch off the I-5 corridor. As a result, rail connectivity issues for the ports and capacity issues on the I-5 rail corridor are necessarily tied. Along the corridor there are five main areas where mainline capacity needs and connectivity issues intersect, including: Vancouver (WA), Kalama to Longview, Centralia, Tacoma, and Seattle. Each of these is examined in more detail in Chapter 5 of the plan.

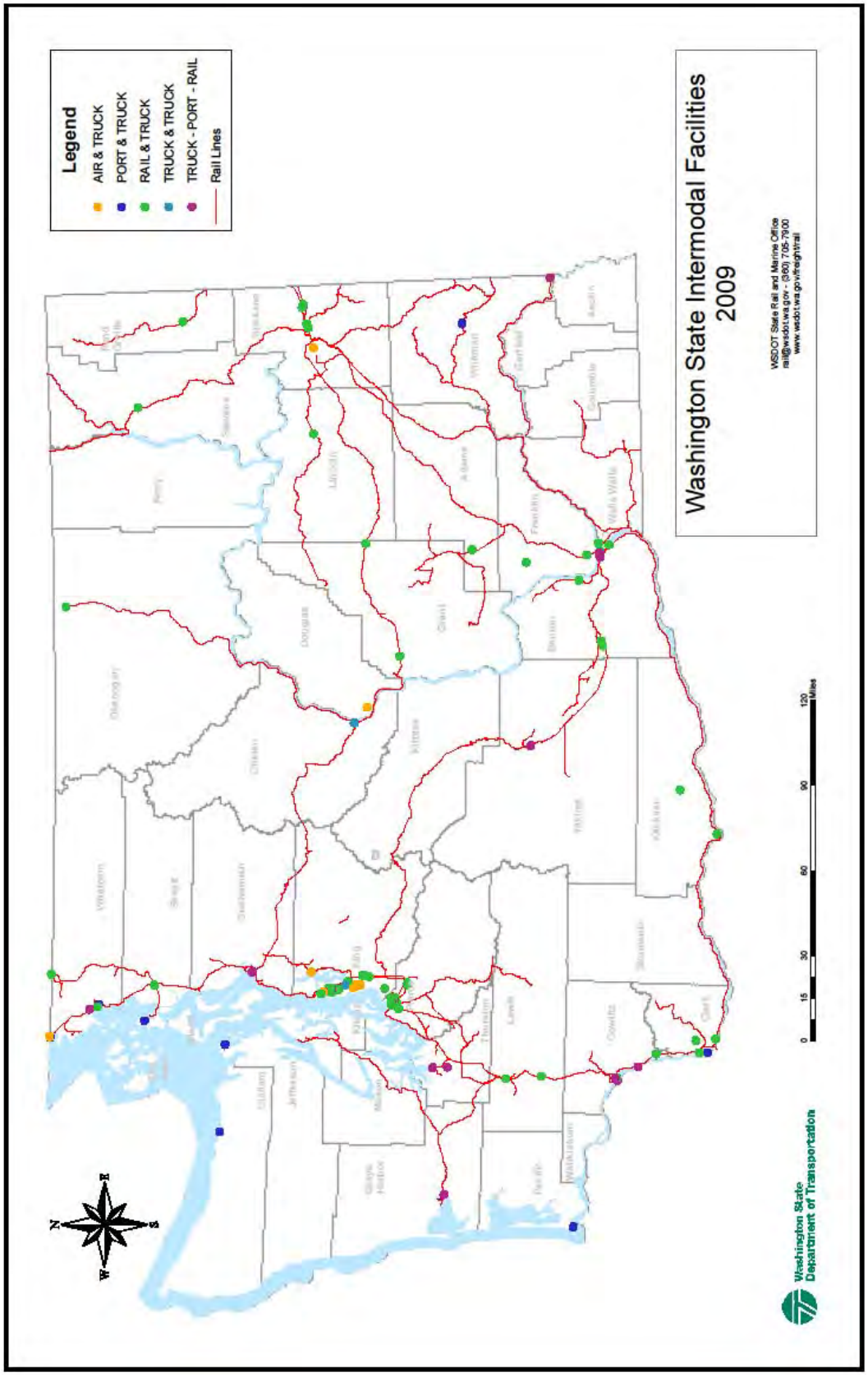
Intermodal Connectors

Intermodal connectors are a location where two modes meet and the cargo moves from one mode to another.[6] In most cases this is moving a piece of cargo from a truck to a train or vice versa. Two examples are inland ports and on-dock intermodal yards. Exhibit ES-8 shows major intermodal facilities located in the state by type of connector.

Rail access is a significant element of port competitiveness. By providing an inland port service, a seaport can (in theory) make intermodal rail service available to a broader range of customers. There must be efficient rail service to both the seaport and the inland port for the model to work. If priced competitively, the inland port service can offer cost savings to container shippers and thereby increase the port's competitiveness.

[6] The intermodal connectors shown are those identified by the USDOT BTS Intermodal Facility database.

Exhibit ES-8: Intermodal Freight Connectors in Washington State



In addition to rail served inland ports, the two most prominent alternatives that involve rail transportation are on-dock intermodal and near-dock intermodal. Examples of these intermodal yards can be seen at the Ports of Seattle and Tacoma. There are other types of intermodal connectors, such as rail-to-barge, truck-to-grain elevators, rail-to-bus, as well as airports. In most cases airports are not supported by rail, although for freight there is the truck-to-plane intermodal connector.

Freight System Issues and Needs

Capacity/Bottlenecks

The benefits that the state can obtain from a robust rail system are threatened because the system is nearing capacity. Service quality is strained and rail rates are going up for many state businesses.

The pressure on the rail system will increase in the next decades, as a result of increased population and demand, economic globalization, and continued containerization. The total freight tonnage rail system is expected to increase by about two to three percent annually over the next 20 years. To accommodate this growth, many more rail lines within the state will be operating at or above their practical capacity.

Growth in rail traffic and rail congestion issues are also affecting state communities by increasing delays for automobile and truck drivers at rail-highway crossings. Increased noise, congestion, and safety problems exist at these crossings. Dealing with these problems in an uncoordinated fashion on a case-by-case basis is often frustrating for both the communities and the railroads.

Competition

State ports are facing competition not only from the southern California ports, but also increased competition from western Canadian ports, including Prince Rupert. There is also the concern that once the Panama Canal is expanded for the larger container ships that the cargo may go ‘all water’ to the East Coast through the canal instead of by rail from the West Coast. At this point, there are many studies predicting potential outcomes of the larger canal, but there is not a consensus on the effect it will have on the state. This plan includes strategies to favorably position the state in the changing competitive marketplace.

Emerging Issues

North-South High Capacity Corridor

The fluidity of the I-5 rail corridor is mandatory for the economic health of the state. This corridor can be classified as extending from Portland, OR to Vancouver, B.C. A north-south corridor, supporting the east-west movements of the majority of the cargo moving through the state, is required to keep the rail network flowing. The BNSF I-5 corridor carries both freight and passenger rail traffic. As the projections of cargo and passenger volumes are met, it will be especially important that attention is kept on the health of this north-south corridor.

It is important to note that the mainline in the I-5 corridor, from Vancouver (WA) to Vancouver, B.C., is owned by BNSF. Amtrak has rights to operate passenger service on this mainline. UP has rights to run on this rail line from Vancouver (WA) to Tacoma. From Tacoma to Seattle, both Class I railroads have their own rail lines and operate separately on their respective rail.

Currently, BNSF has no public plans, other than those announced to support intercity passenger train volumes, to increase capacity over the route. From a freight perspective, BNSF believes sufficient capacity exists for the foreseeable future. Indeed, BNSF's planning staff sees nothing in this corridor as "freight driven" with the current volumes at this time. Increased volumes may require capacity improvements.

In the future, it will be very important to monitor the capacity versus demand of this corridor and prepare capacity improvements to meet the growth projections. This will require coordination between all stakeholders and partners to ensure that capacity is available for this corridor and its communities to meet their respective needs. This may require a true public-private partnership including regional agencies (such as metropolitan planning organizations), Sound Transit, Amtrak, rail freight customers, ports, local communities, as well as other stakeholders. Public funding could include safety improvements, such as grade separations.[7] Private railroad funding could include improvements, such as longer sidings or additional mainline tracks. BNSF has stated that the funding of these longer sidings and additional mainline tracks should not be the exclusive responsibility of the private railroads, when the need is driven by passenger rail service or the need to preserve freight rail service due to increasing passenger rail service.

[7] A grade separation is when an at-grade road that crosses a rail line is separated from the rail line by elevating the road as an overpass over the rail line or the rail line on a trestle.

East-West High-Capacity Freight Rail Corridor

For the state to stay competitive, a strong coalition of stakeholders must build an integrated plan to develop the necessary capacity to retain the state's rail freight market share. A high-capacity rail corridor should be maintained and improved upon from the Puget Sound to Chicago, Illinois. A national cohesive effort needs to be developed by both the public and private partners in order to achieve the economic growth that is required to keep the state competitive.

A compelling business case for proposed improvements to this corridor should be developed. This corridor will require infrastructure and operational improvements as well as improved cooperation between BNSF and the UP. An agreement on priorities needs to occur and a funding program developed. It is important to the state's economy to have healthy railroads competing for business in the state. This competitive positioning influences the Class I railroads' investment within the state. BNSF and UP capital investment decisions and strategies are based upon Return on Investment. Capacity must be available to attract more volume and new customers. To encourage the Class I railroads to invest in this state, it is critical that public investment dollars are available for projects with public benefit.

To hold the Class I railroad's attention to the state, the state's economy must be growing, the ports efficient, and the stakeholders must understand how important the rail system is both to the economy and ports. There must be consensus on the priority of projects and the funding mechanism to get the improvements built. Thus, there needs to be a prioritization of the freight rail projects that have a clear economic benefit to the state. This priority list needs the support of all stakeholders in order for the high priority projects to get done.

Dedicated High-Speed Passenger Rail Track

On August 24, 2009, WSDOT submitted their High-Speed Intercity Passenger Rail Program application to the FRA. This is the first step to the development of a dedicated high-speed passenger rail track along the I-5 corridor from Portland, OR to Vancouver, B.C. This will allow the separation of lower speed freight trains from the higher speed passenger trains and allow for increased service levels for both freight and passengers.

WSDOT applied for nearly $435 million in ARRA funding in this first round under Track 1 projects. The primary focus of Track 1 projects is to help speed economic recovery through construction of "ready-to-go" intercity passenger rail projects. WSDOT has a total of 20 capital rail projects that qualify for Track 1 consideration. When completed, these

projects will add an additional daily Amtrak *Cascades* round trip between Seattle and Portland, improve on-time reliability, reduce rail congestion, and provide enhanced service without affecting freight capacity.

Without the necessary improvements on the I-5 rail corridor, the available capacity on the segment will be exceeded by about 2018, at even the lowest freight recovery scenario. Consequently, it should be expected that BNSF will not allow growth in passenger operations without a clearly defined set of capacity improvements. These improvements would protect freight performance regardless of how the economy recovers over the next few years.

Impacts of Dam Breaching or Loss of the Columbia-Snake Inland Waterway System

The current Columbia-Snake Inland Waterway System is very efficient for moving cargo. This system provides shippers with an alternative to shipping by rail, supplies price competition to the railroads, and imposes sufficient capacity to absorb substantial fluctuations in grain shipments, especially during peak export months and years.

Due to the fear that numbers of Chinook salmon and steelhead in the Snake River would continue to decline, the possibility of breaching (removing) the four Snake River dams was examined in a report issued by the US Army Corp of Engineers in 2002.[8] The discussion on removing the dams continues to this day.

In addition to the effect that dam breaching would have on the system, transportation impacts would also be shifted to the road and rail systems in the region. The mainline rail system, short-line rail system, and state and county road systems could all be expected to bear an increased share of the freight now shipped by barge. This could cause some capacity constraints to be reached.

Statewide Information and Data Needs

Currently, there is not enough rail and freight data collected for statewide rail planning and rail operations. The U.S. Department of Transportation (USDOT) expects that the state rail plan from each state will provide detailed insight into the concerns facing state transportation systems and set forth state visions of how rail transportation can address those issues. One of the elements that USDOT views as necessary includes multimodal transportation, especially ways in which modes can be leveraged to serve transportation customers more effectively and efficiently.

[8] www.efw.bpa.gov/IntegratedFWP/DamBreachingFacts.pdf.

States are in a unique position to provide information on local rail bottlenecks and resultant road and rail traffic congestion. The lack of this information can negatively affect the larger transportation network. Resolution of such issues can improve transportation flows and positively affect the movement of goods and people far beyond state borders.

States can also provide information on projects that they are planning to develop, which may have repercussions beyond state borders, and hence should be considered in the National Rail Plan.[9]

States need greater information management capacity to assess statewide demand, analyze utilization data, and develop and maintain asset inventories and rail system physical and condition inventories.

The Partners

In this state there are numerous partners or players in the rail freight system: first and foremost is the owner of the asset—the railroads—as well as the customers served; second, the ports who are logistics and transportation partners in moving the cargo from ship-to-rail or barge-to-rail; and finally, the regulators and partial funders of the system—the state and federal governments are partners in this system. Other stakeholders included local communities, planning organizations, and tribes. The State Freight Rail Plan Advisory Committee represented these stakeholders in the development of this plan and some are encouraging that the committee stays intact.

Investment Prioritization and Project Evaluation

Freight rail has many benefits. With its cost effectiveness, fuel efficiency, safety records, and lower environmental impacts, freight rail is a viable option that can be included in policy aimed at solving economic, social, and environmental problems with integrated solutions.

Although predominantly privately owned, the freight rail system provides many public benefits that warrant taxpayer participation in improvements at both federal and state levels. The common public benefits associated with freight rail include stimulating the state's economy, supporting local communities and businesses with jobs and revenues, reducing congestion, improving public safety, offering a transportation choice for shippers, reducing environmental pollution, and saving energy.

For rail-related investment, private benefits have typically accrued to rail carriers, shippers, rail property owners, and other non-governmental

[9] See page 1-4 in Chapter 1 for more detail on the National Rail Plan.

groups. Public benefits are broadly assigned to government agencies that represent taxpayers.

Priorities and Criteria

WSDOT developed a benefit/cost methodology and uses it to evaluate state projects against six legislative priorities:

- Economic, safety, or environmental advantages of freight movement by rail compared to alternative modes.
- Self-sustaining economic development that creates family-wage jobs.
- Preservation of transportation corridors that would otherwise be lost.
- Increased access to efficient and cost-effective transport to market for the state's agricultural and industrial products.
- Better integration and cooperation within the regional, national, and international systems of freight distribution.
- Mitigation of impacts of increased rail traffic on communities.

Financing the Needs

The need for expansion to meet future demand can only be achieved through involvement of both the public and private sectors. The state, as well as private rail owners, has invested vigorously in the rail systems in the recent years. Although federal transportation funding in the United States has remained at 1 percent over the last 20 years, more federal investment in the state's freight rail system is needed.

There should be a national freight policy and a dedicated consistent funding stream for freight rail transportation. There has been movement at the federal level in this area, with efforts by the FRA, to develop the National Rail Plan, which should then provide input into a National Freight Policy.

State Role

This plan describes the state's role and investment policies for freight rail that should be used as a guideline for the state's future freight infrastructure investments. Funding the necessary investments in the freight rail system should be shared among those that receive benefits from the system in proportion to those benefits received.

A consistent investment program that maintains and improves the state freight rail system is critical. This will create an outline for the state's funding that meets the public benefit criteria. These should include improvements that divert truck traffic from overburdened highways, including many of the vertical clearance limitations. Priority should be

made on investments that leverage weight carrying abilities of rail to increase efficiencies, as well as increasing safety at rail-highway crossings.

Conclusion

This plan will address the goals and strategies of improving freight rail service within the state. The plan will be updated on a regular basis to respond to the changing economic climate. The completion of the National Rail Plan at the federal level may require a revision to this plan to meet any new requirements directed to the states. In addition, any future studies will be incorporated into appendices as new information becomes available.

The greatest obstacle to implementation of this plan is the lack of a dedicated reoccurring funding source at both the state and federal levels. With 90% of the $2.0 billion in rail needs identified in this plan unfunded, the state will have to pursue federal funding, as well as boost state spending, and establish public-private partnerships to close the gap between available resources and freight rail needs.

The second largest obstacle will be determining the priority of the projects and which projects should be implemented first to gain the maximum benefit to the system as a whole.

Washington State Department of Transportation

Chapter 1: Plan Purpose and Authority

Purpose of the State Freight Rail Plan

The *Washington State 2010-2030 Freight Rail Plan* is an update of the *Washington State Freight Rail Plan 1998 Update*. These plans fulfill the Federal Railroad Administration's (FRA) requirements that a state must establish, update, and revise a rail plan in order to receive federal funds. This plan also reflects strategies to:

- Increase the effectiveness of the rail program.
- Broaden understanding of rail issues for all stakeholders.
- Provide a framework to implement rail initiatives in Washington State (state).
- Support the Washington State Department of Transportation (WSDOT) in federal funding opportunities, such as the Transportation Investment Generating Economic Recovery/American Recovery and Reinvestment Act grants.
- Implement the rail benefit/cost analysis required by the legislature.
- Fulfill new federal requirements for state rail plans.

Washington State Department of Transportation

WSDOT is the steward of the state's interstate, highway, and ferry systems. WSDOT directly manages the planning, design, project delivery, and operations for over 18,000 lane miles of state highway and more than 3,600 bridges, as well as operates the largest ferry fleet in the United States. In addition to building, maintaining, and operating the state highway system and state ferry system, WSDOT works in partnership with others to maintain and improve local roads, railroads, airports, and multimodal facilities and programs that offer alternatives to driving alone. WSDOT also own 323 miles of rail and operates 297 miles of these rail lines.

WSDOT's State Rail and Marine Office

WSDOT's State Rail and Marine Office is responsible for managing and directing the state's freight and passenger rail capital and operating programs. It enacts the direction of the legislature as it impacts rail and marine initiatives and manages rail system improvements that support economic development, move people and goods, relieve road and airport congestion, and reduce greenhouse gas emissions. The State Rail and Marine Office works with railroads, ports, communities, and other

organizations to improve the state's rail system. This office is also responsible for rail project identification and assessment, strategic rail transportation planning, development of state rail and marine data, and state rail grant program administration.

State and Federal Legislative and Planning Requirements

WSDOT's rail planning efforts are implemented within the context of specific state and federal legislation and related planning requirements that are summarized below.

State Requirements

There are four requirements for a rail plan in state law. The two primary statutes are: the Revised Code of Washington (RCW) 47.76.220 that requires WSDOT to create a state rail plan and RCW 47.06.080 that requires WSDOT to create a freight rail plan. This plan satisfies both statutory requirements. Highlights of these and other pertinent statutes follow.

RCW 47.76.220 (state rail plan - contents) requires WSDOT to prepare and periodically update a state rail plan that identifies, evaluates, and encourages essential rail services. The plan must identify and evaluate mainline capacity issues, port and congestion issues, and address at-risk or abandoned lines. It must establish priorities to determine which rail lines should receive state support. Priorities should include anticipated benefits to the state and local economy, anticipated line impact to roads and highway improvements, financial viability of state-funded lines, and line impact on energy use and air pollution. It must identify, describe, and map the state rail system; identify and evaluate rail commodity flows and traffic types; identify rail banked or preserved lines or corridors; and identify and describe other issues affecting the state's rail traffic.

RCW 47.06.080 requires WSDOT to include a state freight rail plan as one of the state-interest components of the statewide multimodal transportation plan. This plan must fulfill the statewide freight rail planning requirements of the federal government, identify freight rail mainline issues, identify light-density freight rail lines threatened with abandonment, establish criteria for determining the importance of preserving the service or line, and recommend funding priorities. It must also identify existing intercity rail rights of way that should be preserved for future transportation use.

RCW 47.04.280 (Transportation System Policy Goals) states that all public investments in transportation, including transportation planning,

should support achievement of these five policy goals: preservation, safety, mobility, environment, and stewardship.

RCW 47.06.040 (statewide multimodal transportation plan) requires WSDOT to coordinate development of the *Washington State 2010-2030 Freight Rail Plan* with other transportation plans to ensure consistency with each other and with the state transportation policy plan.

Government-to-Government Tribal Consultation

WSDOT maintains government-to-government relations with 35 federally recognized tribal governments. The following policies and documents guide WSDOT:

- The **1989 Centennial Accord Between the Federally-Recognized Indian Tribes in Washington State and the State of Washington** was executed between the federally-recognized Indian tribes of Washington signatory to this Accord and the state of Washington through its Governor. The Accord provides a framework for a government-to-government relationship and implementation procedures to assure execution of that relationship.
- The **1999 Government-to-Government Implementation Guidelines** provide a consistent approach for state agencies and tribes to follow.
- The **2005 Governor's Executive Order 05-05, Archaeological and Cultural Resources** orders all state agencies to review capital construction projects and land acquisitions, which do not undergo Section 106 review under the National Historic Preservation Act of 1966, with the Department of Archaeology and Historical Preservation and affected tribes to determine potential impacts to cultural resources.
- The **2009 Washington State Secretary of Transportation Executive Order 1025.01, Tribal Consultation** reaffirms the commitment of WSDOT to provide consistent and equitable standards for working with the various tribes across the state. WSDOT recognizes that each federally recognized tribe is a distinctly sovereign nation. WSDOT's goal is to create durable intergovernmental relationships that promote coordinated transportation partnerships in service to all citizens. More information on specific consultation procedures is available in the *WSDOT Centennial Accord Plan*.

Federal Statutory Requirements

The Passenger Rail Investment and Improvement Act of 2008 (PRIIA) amends Title 49 of the United States Code to prevent railroad fatalities, injuries, and hazardous material releases, to authorize the Federal Railroad

Safety Administration, and for other purposes. It is known as Public Law 110-432 (PL 110-432) and was approved as House Resolution 2096.[1]

PL 110-432, Division B, Title 3, Section 303, Chapter 227 attempts to put rail on an equal footing with planning for other transportation modes by requiring state rail planning as the basis for federal and state rail investments within the state. State rail plans are comprehensive documents intended to lay out the state's vision, objectives, service goals, capital investment plans, and project funding priorities for all passenger and freight rail services. They are submitted to the U.S. Department of Transportation (USDOT) Secretary for review and approval and updated at least every five years for re-approval.

PL 110-432 requires designation of the state authority to prepare, maintain, coordinate, and administer the rail plan, and designation of the authority to approve the rail plan. The authority to prepare, maintain, coordinate, and administer the rail plan is the WSDOT State Rail and Marine Office. The authority to approve the rail plan is the WSDOT Secretary of Transportation.

See Appendix 1-A for the detailed state and federal requirements referenced in this plan.

Development of the State Freight Rail Plan

Federal Planning – the National Rail Plan

Under PRIIA Section 307, the USDOT is to develop a national rail plan that is consistent with approved state rail plans and national rail needs to promote an integrated, cohesive, efficient, and optimized national rail system for the movement of goods and people. The national rail plan will expand upon the vision of a national rail system, including identifying specific corridor goals and success measures. The plan will likely provide an opportunity to revise the high-speed rail designations, including a new category of approved corridors, i.e., those corridors for which a detailed corridor plan and institutional framework are in place to permit development of a successful corridor that meets the national rail goals.[2]

FRA and their stakeholders are discussing the following:

- What should be in America's national rail plan?

[1] HR 2096, pp 100-104, http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=110_cong_bills&docid=f:h2095enr.txt.pdf.
[2] www.fra.dot.gov/downloads/rrdev/hsrstrategicplan.pdf.

- What is the best process to bridge from a preliminary national rail plan to the long-range national rail plan?
- What should be the interface between state and national plans?

The FRA preliminary plan sets forth a proposed approach for developing the long-range national rail plan, including goals and objectives for greater inclusion of rail in the national transportation system. The preliminary plan does not offer specific recommendations, but instead describes itself as the "springboard" for future discussions.

Relationship with Other Plans

The *Washington State 2010-2030 Freight Rail Plan* is related to statewide, regional, and tribal transportation plans that include multimodal components and are designed to meet federal and state requirements.

Washington State Freight Rail Plan 1998 Update

The *Washington State Freight Rail Plan 1998 Update* is the previous update. It was prepared by the WSDOT freight rail program to meet state and federal requirements to identify, evaluate, and encourage essential rail services.

Passenger Rail Plans

The *Long-Range Plan for Amtrak Cascades* (2006) and the *Amtrak Cascades Mid-Range Plan* (2008) are passenger rail planning counterparts of the *Washington State 2010-2030 Freight Rail Plan.*[3] They were developed by the WSDOT State Rail and Marine Office to meet federal and state requirements for passenger rail development. The long-range plan is the state's blueprint for the development of intercity passenger service—it identifies the needed improvements to the state's intercity rail system for the next 20 years. The mid-range plan identifies and develops options that outline the steps needed to achieve incremental Amtrak *Cascades* services in meeting demands of the next eight years.

Statewide Transportation Plans

The *Washington State 2010-2030 Freight Rail Plan* recognizes that rail passenger and freight services are critical to the state's transportation system. Cost-effective investment of the state's resources must consider other modes, including highways, aviation, and water. The preferred mode of transportation and investment is dependent on the type of traffic as well as the origin and destination of the cargo.

[3] www.wsdot.wa.gov/Freight/publications/PassengerRailReports.htm.

The *Washington State 2010-2030 Freight Rail Plan* is coordinated with these other transportation planning efforts.

- The *2007-2026 Washington Transportation Plan* (WTP) is the statewide multimodal transportation plan that meets state and federal planning requirements to guide investments in the entire transportation system. It includes investment strategies for state-owned facilities as well as descriptions of the state's interest in aviation, marine ports and navigation, freight rail, intercity passenger rail, bicycle and pedestrian walkways, and public transportation. WSDOT will update this plan after the federal transportation planning requirements are passed, at which time this plan will be renamed the *Statewide Multimodal Transportation Plan*. The *Washington State 2010-2030 Freight Rail Plan* is consistent with the 2007-2026 WTP.
- The Washington State Transportation Commission (WSTC) is preparing a *Washington Transportation Plan 2011-2030 Update* that meets state requirements for a statewide transportation plan that is consistent with the state's growth management goals and transportation system policy goals, reflects the priorities of government, addresses regional needs, and recommends policies to the Governor and legislature. This plan is due December 2010, and is updated every four years.
- The *2009-2015 WSDOT Strategic Plan, Business Directions*, identifies WSDOT's strategic direction for the 2009-2011 biennium and beyond. WSDOT has diverse responsibilities and many lines of business, and not everything WSDOT does is represented here. Instead, the plan focuses on what is believed to be the highest priorities for state citizens, now and into the future.

- For other transportation "modal" plans developed by WSDOT, please go to www.wsdot.wa.gov/planning/ModalPlans.htm.

Metropolitan Transportation Plans

A Metropolitan Planning Organization (MPO) is an organization of elected officials in urbanized regions with 50,000 or more population. MPOs are required by federal regulations to create metropolitan transportation plans and a list of proposed transportation improvements called a Metropolitan Transportation Improvement Program.

Regional Transportation Plans

Regional Transportation Planning Organizations (RTPO) are formed through a voluntary association of local governments within a county or contiguous counties. RTPOs create a regional transportation plan and a list of proposed transportation improvements called a Regional Transportation Improvement Program. RTPO members include WSDOT,

cities, towns, counties, tribes, ports, transportation service providers, private employers, and others.

If an MPO is within the boundary of an RTPO, then the RTPO is the lead agency for the MPO.

Federal Lands Highway Program Transportation Plans

The Office of Federal Lands Highway (FLH) works with numerous agencies. Approximately 30 percent of the land in the U.S. is under jurisdiction of the federal government. The federal land management agencies (FLMAs) are: the Bureau of Indian Affairs, U.S. Forest Service, National Parks Service, Fish and Wildlife Service, Bureau of Land Management, Military Surface Deployment and Distribution Command, U.S. Army, U.S. Army Corps of Engineers, Department of Defense, Tennessee Valley Authority, and the Bureau of Reclamation. The FLH also works closely with many state and territorial partners.

The Federal Lands Highway Program (FLHP) is subdivided into five core areas, namely, the Forest Highway Program, Park Roads and Parkways Program, Public Lands Highway Discretionary Program, Indian Reservations Roads Program, and the Refuge Roads Program. The FLHP is administered through partnerships and interagency agreements between the Federal Highway Administrations' FLH, FLMAs, and tribal customers. The FLHP also supports other important FLMA partners by providing funding (about $6 million per year total) for integrated transportation planning, bridge inspections, and other technical assistance activities.

State Freight Rail Plan Methodology

The strategy adopted by WSDOT to develop the *Washington State 2010-2030 Freight Rail Plan* is fact-based and data-driven. WSDOT strengthened its data collection and analytical capacity and developed improved databases and forecast models to better describe and articulate the needs of the freight rail system. Economic impact assessment, benefit/cost analysis, and cross modal comparison link investments to their effects on the economy and society. With this plan, policymakers and other users can address socioeconomic policy issues and integrate transportation solutions when considering funding freight rail projects.

Key References

The following are key references used in developing this plan:

- The *2009 AASHTO State Rail Planning Guidebook*, developed by the American Association of State Highway and Transportation Officials

(AASHTO), is designed to help states produce PRIIA-compliant state rail plans customized to the unique circumstances of each state. This plan was developed using this guidebook.

- The *Statewide Rail Capacity and System Needs Study* (2006)[4] is a key reference prepared by the WSTC. This comprehensive study was developed to address the key question asked by the legislature, "Should the state continue to participate in the freight and passenger rail system, and if so, how can it most effectively achieve public benefits?" The conclusion: the state should continue to participate in the freight and passenger rail systems, although each investment must be extensively evaluated for its cost and benefits to the state. **Because its components are similar to the *Washington State 2010-2030 Freight Rail Plan's* state and federal requirements, the study is referenced throughout this plan.**
- The *2009 Marine Cargo Forecast Technical Report*[5] is another key reference prepared by the Washington Public Ports Association and WSDOT. Its purpose is to assess the expected flow of waterborne cargo through Washington's port system and evaluate the distribution of cargo throughout the state's transportation network, including waterways, rail lines, roads, and pipelines.
- In order to keep stakeholders and citizens aware and involved in the plan development process, WSDOT provided this Web page: www.wsdot.wa.gov/Freight/Rail/WashingtonStateFreightRailPlan.htm.
- The WSDOT Web site, www.wsdot.wa.gov, provides public access to transportation-related information. It is a key communication tool used to meet state and WSDOT goals to be a high performance organization that is credible and accountable to the Governor, legislature, taxpayers, and transportation delivery partners across the state.[6]

Key Stakeholders

This plan was developed by WSDOT State Rail and Marine Office staff. The staff augmented their knowledge with the help of public involvement and assistance, primarily from the State Freight Rail Plan Advisory Committee (Advisory Committee).

The Advisory Committee consisted of self-selected, volunteer stakeholders from around the state. In May 2009, members of railroads,

[4] *Statewide Rail Capacity and System Needs Study* (2006) by the WSTC, www.wstc.wa.gov/Rail/default.htm.
[5] *2009 Marine Cargo Forecast Executive Summary*, www.wsdot.wa.gov/NR/rdonlyres/270BB86A-FC7B-48F3-8546-8CB3A435A2B8/0/MCF2009ExecutiveSummary32309doc.pdf.
[6] WSDOT Accountability & Performance Information, www.wsdot.wa.gov/Accountability.

ports, shippers, industries, metropolitan planning organizations, regional transportation planning organizations, state and federal agencies, cities, counties, tribes, and other interest groups were invited to participate on the Advisory Committee. The role of this committee was to:

- Help develop the vision and goals of the state freight rail plan.
- Provide assistance to update information for the freight rail system, capacity, and needs.
- Help identify and assess port access and rail abandonment issues.
- Help assess and evaluate beneficial impacts of rail infrastructure improvements on society.
- Help WSDOT understand concerns of local communities and organizations.
- Share information.

Public Involvement Process

Public involvement and outreach was essential to the development of the *Washington State 2010-2030 Freight Rail Plan*. Public involvement and outreach included Advisory Committee meetings, a workshop, communication, Web interfaces (e-updates, Web pages, Web linkages), presentations, internal and external stakeholder meetings, press releases, and an open house.

See Appendix 1-B for more information about the public involvement, public participation, and documentation of these planning processes.

Environmental Review

Environmental documentation will be project-specific and comply with the State Environmental Policy Act (SEPA) and/or National Environmental Policy Act (NEPA), depending on the existing and anticipated source of project funding. The level of environmental documentation will be determined based on the potential environmental effects of the proposed projects.

Plan Organization

Chapter 1 introduces the *Washington State 2010-2030 Freight Rail Plan*, its state and federal statutory requirements, and its relationships with other plans. It discusses the purpose of the plan, describes the WSDOT State Rail and Marine Office, legislative, and planning requirements for the plan. The plan purpose and the methodology WSDOT adopted to develop the plan including public involvement is also described.

Chapter 2 discusses the overview of the rail system and macroeconomic environment. The vision statement, goals, and goal strategies are introduced in this chapter.

Chapter 3 defines the current freight rail systems in the state. It provides maps, a physical inventory of railroads and facilities, railroad profiles, descriptions of strategic intermodal sites, and addresses the need for a condition inventory of railroads and facilities.

Chapter 4 describes how the state's freight rail system supports the state's economy. It assesses commodity flows and industrial use of freight rail capacity. This includes the ancillary freight benefits that can be passed on to shippers and carriers as a result of passenger rail infrastructure development. It also describes the macroeconomic context of the state's freight rail system development. Components include economic vitality; mobility and congestion; environment, energy, and climate change; and safety and security.

Chapter 5 addresses the changing rail systems. It provides rail system maps and a database of recently abandoned rail lines. It identifies port access issues as well as intermodal connectors. It identifies and describes state, regional, local, and private rail projects.

Chapter 6 discusses the current state role, the players, and partnerships involved in state rail investments. It describes the current needs including data management and information capacities, statewide coordination, funding capacities, and strategic planning efforts.

Chapter 7 describes investment prioritization and project evaluation, including the decision-making process, a discussion on priority methods and criteria, and the benefit/cost methodology used to analyze freight rail projects.

Chapter 8 discusses the projects and current funding sources in the state, federal, local, and private arenas; the strategies of how funding should be acquired; and the vision of future funding options. Discussions include the public interest in private freight rail development and related federal and state legislation, financing, and funding strategies.

Chapter 9 concludes the plan with a discussion of next steps.

Washington State Department of Transportation

Chapter 2: State Rail Vision

Introduction

Railroads carry a significant share of Washington State's (state) freight and make contributions to the state economy. The state freight rail system is part of the larger freight transportation network, providing businesses, ports, and farms with competitive access to North American and international markets.

Currently in Washington State, 53 percent of goods by weight are moved by truck, 18 percent by rail, 17 percent by pipeline, 10 percent by water, and 2 percent by air and other modes.[1] The trucking system is the railroad's biggest customer. Transportation modes do not operate in isolation, but generally operate together to provide an integrated system of movement. Little in the way of goods or people gets to their destination without the use of several modes of transportation. Consequently, the modal interchanges—in the case of freight, ports, transloading facilities, and distribution centers—are critical nodes in the system. These modal interchanges can function smoothly or create bottlenecks in the system. Chapters 3 and 5 discuss bottlenecks in more detail.

In addition to contributing to the state's economic vitality, rail transportation and investment could significantly alter the current transportation modes and practices of the way cargo has been historically moved. Rail can be used to relieve congestion in some urban areas, as well as provide redundancy within the transportation system. Rail is an energy-efficient and cleaner transportation alternative to many other modes.

The state's freight rail system is largely operated by the private sector. Because it is essential to the state economy and society, the Washington State Department of Transportation (WSDOT) has a public role to play under state and federal statutory requirements that guide public freight rail investments and development. Funding and delivery of freight mobility projects at the state level is primarily focused on two agencies: WSDOT and the Freight Mobility Strategic Investment Board (FMSIB).

[1] WSDOT State Rail and Marine Office – Analysis based on Federal Highways Administration (FHWA) Freight Analysis Framework (FAF) data and Surface Transportation Board (STB) Waybill Data.

The *Washington State 2010-2030 Freight Rail Plan* articulates the existing and future role of freight rail within a state multimodal transportation system. The plan establishes a vision and goals for statewide freight rail systems development, examines current and needed freight rail assets, and provides a clear path to implement rail improvements.

The state's multimodal transportation system is comprised of a mix of modes that are owned and operated by public and private entities. The transportation network includes: rail lines, highways, ferries, local roads, public transit systems, bicycle and pedestrian facilities, ports, waterways, airports, pipelines, and intermodal terminals. This integrated system supports the movement of people and goods within the state, facilitating economic vitality to business and residents. The state's freight network serves three functions:

1. It supports regional economies by bringing state goods to national and international markets as well as domestic products to the state.
2. It is also a fundamental local utility supporting the retail and wholesale distribution system.[2]
3. It serves as a global gateway to support national and international trade flows through the state, providing a competitive advantage for such sectors as logistics and trade, manufacturing, agribusiness, and timber/wood products sectors.

Freight mobility is critical to the state's economy. In 2007[3] the state's freight systems supported over one million jobs in state freight-dependent industry sectors, which produced $434 billion in Gross Business Income. This is 71 percent of the state's Total Gross Business Income of $627 billion.[4]

The rail industry is one of the most capital intensive businesses in the nation. Most available capital is used by the railroads to maintain their infrastructure and equipment with very little left for capacity improvements. To improve the margins, the Class I railroads[5] have increased their efficiencies by using a "hook and haul" operating method. Hook and haul refers to the model of having other entities (ports or short lines) prepare the train for long distance runs of 500 miles or more. Hook and haul operations with short lines provide continuation of service and often improve service levels to the industrial customers the short lines serve. Efforts to improve Class I railroad efficiencies include the

[2] Washington Transportation Plan (WTP) Freight Report, 2006.
[3] 2007 data is the most current year available.
[4] Gross Business Income is a measure of total revenues reported to the state.
[5] The classes of railroads are classified by revenue produced per year. Refer to Appendix 9 for definitions of Class I, Class II, and Class III railroads.

consolidation of shipments. It is understood that resulting cost efficiencies and savings are to be passed on to shippers.

Changes that improve Class I railroad efficiencies may hurt agricultural growers and other small shippers. This is in addition to the challenges these smaller customers have in gaining access to empty rail cars in a timely basis.

As private sector system owners, the Class I railroads have a need to achieve their own objectives. The lack of congruency in the two sets of goals raises conflicts between Class I railroads and the state. This is a dilemma for the state as it looks to a cleaner, more efficient hauler of goods. The challenge for the state is to develop a working relationship with Class I railroads that promotes the use of rail, while requiring private investment for private benefit. This includes determining what and when public benefit is achieved and investing public monies when this benefit is earned. A new approach needs to be crafted as rail dynamics shift. All stakeholders should work together as partners with the Class I railroads to develop strategies that meet the goals of the state and the needs of the railroads.

Another area of concern is the short-line system, which has largely been developed by the spin-off/sale of smaller unprofitable branch lines. These feeders or spurs are vital to the state's agriculture and small business owners. Many of the short lines are constantly struggling to perform and survive. This is a place where the state has focused its support in the past. This public support helps the smaller shippers in the rural areas continue to access the national rail systems via the short-line network.

Macroeconomic Environment

The state faces both challenges and opportunities resulting from the fundamental changes in the economy and society within a macroeconomic policy environment. Freight rail development, similar to passenger rail development,[6] was once viewed by the state as simply a means to move people and goods. Now such development is increasingly viewed and used as an integrated macroeconomic solution to achieve multiple ends.

Driving forces in the state's macroeconomic environment are trends in economic vitality, living-wage employment, transportation system efficiency, environmental sustainability, and safety and security. Challenges include economic globalization, population growth, capacity

[6] *Amtrak Cascades Mid-Range Plan*, (2008), www.wsdot.wa.gov/freight/publications/amtrakcascades.htm.

increases on rail corridors, higher fossil fuel prices, and global climate changes.

The state, including WSDOT, is increasing the monitoring, analytical, and policy efforts to increase efficiency, relieve congestion, and develop robust and resilient transportation systems.

The Washington State Legislature, in 2007, passed SSB 5412, which states that all public investments in transportation should support achievement of five transportation policy goals listed in the Revised Code of Washington (RCW) 47.04.280. Public investments in transportation should support achievement of these policy goals. This plan was developed around these five goals.

1. **Preservation:** To maintain, preserve, and extend the life and utility of prior investments in transportation systems and services.
2. **Safety:** To provide for and improve the safety and security of transportation customers and the transportation system.
3. **Mobility:** To improve the predictable movement of goods and people throughout the state.
4. **Environment:** To enhance the state's quality of life through transportation investments that promote energy conservation, enhance healthy communities, and protect the environment.
5. **Stewardship:** To continuously improve the quality, effectiveness, and efficiency of the transportation system.

Changes in Transportation

Transportation has encountered many changes and pressures in the last decade. Some of these pressures are listed below.

Mobility and Congestion

The transportation system is increasingly stressed, manifesting itself in capacity and congestion problems at key regional gateways, intermodal transfer facilities,[7] and along critical transportation corridors. Population growth adds to the pressure on this already constrained infrastructure. It is increasingly difficult to balance freight mobility needs with environmental, social, and financial concerns. Rapidly rising infrastructure maintenance costs across all modes raises awareness that neither the public nor private sectors—acting independently—have the necessary resources to fully address rising transportation demands. Individually or collectively, these issues erode the efficiency and productivity of the region's transportation system. This leads to economic

[7] Intermodal transfer facilities are locations where freight is transferred between freight modes.

implications that reverberate locally, regionally, nationally, and internationally.[8]

Moving Washington[9] is WSDOT's program to realize a vision of congestion relief in the next decade. In the program are strategies to add capacity strategically, operate systems more efficiently, and provide more choices to help manage demand. The program's primary objective is to improve, which is one of the state legislature's five transportation priorities, along with preserving our transportation infrastructure, making the system safe for all, ensuring environmental sustainability, and practicing sound stewardship.

Moving Washington is also a 2-, 6-, and 10-year plan that focuses on the most troublesome corridors in Washington.

Over the next ten years we will:

- Improve travel times by 10 percent.
- Reduce collisions by 25 percent.
- Improve trip reliability by 10 percent.
- Provide choices for commuters in our major corridors.

Freight rail transportation is consistent with *Moving Washington*'s congestion relief strategies, if it can reduce long-haul truck traffic on the state highways.[10]

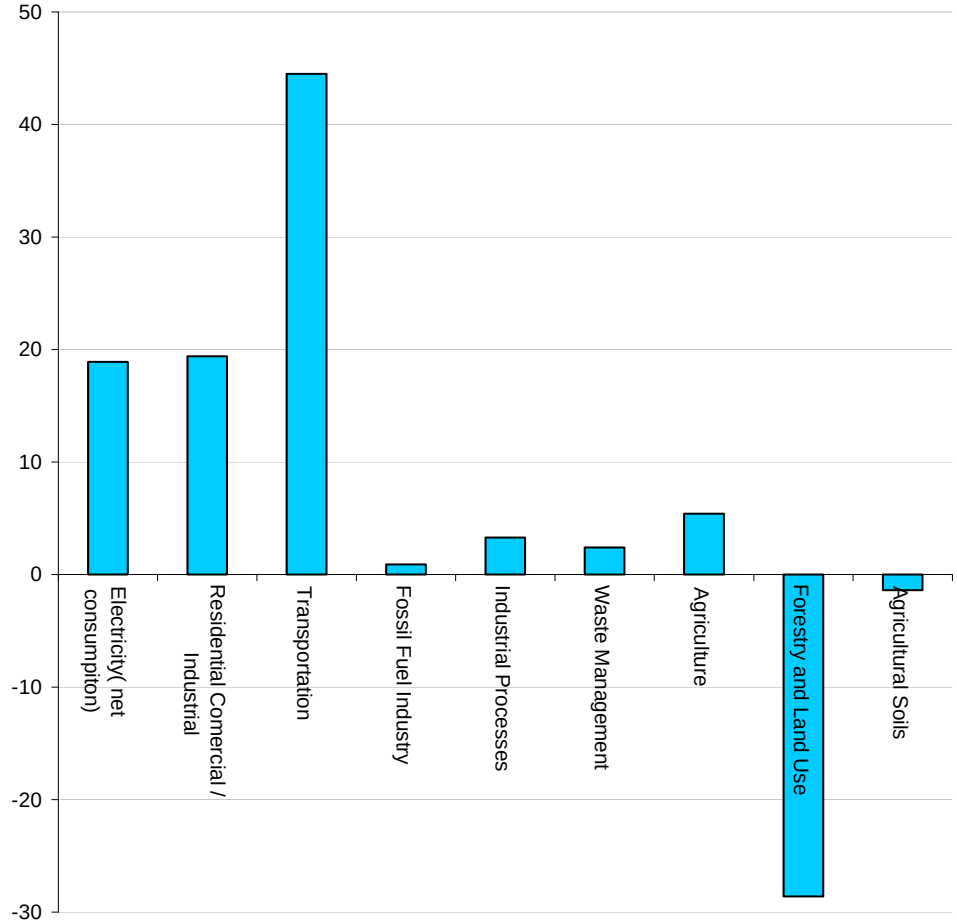
Environment, Energy, and Climate Change

In the state, transportation accounts for nearly half (47 percent) of the total greenhouse gas (GHG) emissions, including emissions from cars, trucks, trains, planes, and ships (Exhibit 2-1). The large amount of hydroelectric generation in the state leads to lower contribution of the electric sector to total emissions, compared with the national average.[11] WSDOT is developing effective, measurable, and balanced emission reduction strategies for all transportation modes, including rail, to protect public health and the environment.[12]

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[8] *West Coast Corridor Coalition Trade and Transportation Study, Executive Summary*, www.camsys.com, April 2008.
[9] *Moving Washington* – A program to fight congestion, www.wsdot.wa.gov/movingwashington/.
[10] WSDOT, *Moving Washington with Rail Transportation*, folio, www.wsdot.wa.gov/movingwashington.
[11] Washington State GHG Inventory and Reference Case Projection, Center for Climate Strategies, Spring 2007. In 2005, Washington had a much larger fraction (47%) of the GHG emissions from transportation activities as compared to the US (28%).
[12] WSDOT Climate Change, www.wsdot.wa.gov/environment/climatechange/.

Exhibit 2-1: Washington 2005 GHG Emissions
(Millions Metric Tons CO_2)[13]



Source: Washington Department of Ecology

Transportation is one of the largest GHG source sectors in the state. The transportation sector includes light- and heavy-duty (on-road) vehicles, aircraft, railroad locomotive engines, and marine engines. Carbon dioxide (CO_2) accounts for about 98 percent of transportation GHG emissions from fuel use. Most of the remaining GHG emissions from the transportation sector are due to nitrogen oxide (NOx) emissions from gasoline engines. Rail emits fewer greenhouse gases than other transportation modes (Exhibit 2-2). Increasing the use of rail transportation may lead to a reduction in GHG from the transportation sector.

[13] Forestry and Land Use and Agricultural Soils are negative due to the fact that these two categories are effective in reducing GHG.

Exhibit 2-2: Greenhouse Gas Emissions by Mode
(grams/ton-mile)

	Road	Rail	Air
Carbon Dioxide (CO_2)	235.33	40.00	1,469.33
Nitrogen Oxide (NOx)	1.99	0.74	6.31
Particulate Matter (PM_{10})	0.47	0.05	0.80
Carbon Monoxide (CO)	1.21	0.42	6.26
Sulfur Dioxide (SO_2)	0.30	0.12	2.27

Source: Environmental Science Technology, 2007, 41, 7138-7144

Congress has proposed a bill that, if enacted, may create clean energy jobs, achieve energy independence, reduce global warming pollution, and transition to a clean energy economy.[14] For rail transportation, this means that more publicly- and privately-owned railroads will switch to cleaner fuels and increased fuel efficiency, retrofit existing engines, ensure that the best available engine technologies are purchased for new equipment, and continue to make operational efficiency improvements.[15]

Climate change is redefining transportation planning throughout the world with calls for additional data and measurement criteria and eventually recommending new policies.

In 2009 several bills were signed into state law related to transportation and climate change. E2SSB 5560 (Agency Climate Leadership) resulted in several state laws.

RCW 70.235.050 requires all state agencies to meet statewide GHG emission limits and report GHG emissions to the Department of Ecology.

RCW 43.21M.040 requires that agencies "shall consider" an integrated climate change response strategy when designing, planning, and funding infrastructure projects.

RCW 43.21M.010 directs the Departments of Ecology, Agriculture, Commerce, Fish and Wildlife, Natural Resources, and Transportation to develop an integrated climate change response strategy for state, local, and private businesses to prepare for, address, and adapt to the impacts of climate change.

[14] American Clean Energy and Security Act of 2009, www.opencongress.org/bill/111-h2454/show/.
[15] www.maritimeairforum.org/news/NW_Ports_Clean%C2%ADAirStrategy_Draft.pdf.

Governor Gregoire's Executive Order 09-05[16] directs the Department of Ecology to participate in the Western Climate Initiative and assist in developing a regional greenhouse gas emission reduction program. Under this executive order WSDOT is required to:

- Consult with state agencies, local governments, business, and environmental representatives to evaluate potential changes to the vehicle miles traveled benchmarks established in RCW 47.01.440.
- Report recommendations to the Governor by December 31, 2010.

Livable Communities

The use of rail for both freight and passenger transportation can increase a community's vitality and livability.

Livability is defined in many ways but the term typically describes a compact, mixed-use community or neighborhood that makes efficient use of existing public infrastructure, supports transportation choices, and provides affordable residential areas near shopping, work, and schools. Increased access to passenger rail supports the concept of livable communities. In addition, separating rail from vehicles and non-motorized transportation modes can increase a community's livability by increasing driver and pedestrian safety.

In the state's communities, as the rail system nears capacity due to economic growth, service quality can be strained. Rail rates are increasing for many businesses. Thus, the pressures on the rail system and its corridors are escalating.[17] Rail investments are generating jobs, as other family-wage jobs are lost to overseas operations and businesses reduce their workforce to survive.[18] Integrating rail and land use planning and policies that are consistent with the state's vision is a must, if livability in the form of sustainable communities is to be achieved. Building strong public-private partnerships that develop sound funding strategies will enable the enhancement of the existing rail infrastructures and corridors. These actions will allow for the maintenance and preservation of additional right of ways.

[16] 2009 Legislation and Governor's Climate Change Executive Order Summary www.wsdot.wa.gov/environment/climatechange/.
[17] Washington State Transportation Commission, December 2006, *Statewide Rail Capacity and System Needs Study: Final Report*, www.wstc.wa.gov/Rail/RailFinalReport.pdf.
[18] WSDOT, December 2008, folio, *Moving Washington with Rail Transportation*.

Vision of Rail Transportation in Washington State

Developing a long-term vision for rail transportation in the state takes many voices. These voices include many stakeholders, including Indian tribes; public entities—federal, state, and local agencies, ports and metropolitan/regional transportation planning organizations (MPOs/RTPOs)—; and private entities, such as rail industry representatives, shippers, various interest groups, and residents and businesses. The State Freight Rail Plan Advisory Committee (Advisory Committee) includes many of these stakeholders, who provided invaluable assistance and input into the planning process.

The vision statement development process began with knowledge gathered from the *Washington State Freight Rail Plan 1998 Update*, the *Statewide Rail Capacity and Systems Needs Study* (2006), and other resources. The WSDOT State Rail and Marine Office held a workshop with the Advisory Committee and other key stakeholders to create a vision statement and goals matrix. Workshop input was summarized and synthesized into draft documents that were further reviewed and refined. Key stakeholders also provided focused assistance in refining the vision and goals documents.

2030 Vision of Rail

The Washington State freight rail system is:

- ***Reliable.***
- ***Cost effective.***
- ***Energy efficient.***
- ***Environmentally-friendly transportation mode for domestic and international cargo deliveries.***

As a critical part of Washington's multimodal transportation system, the rail system leverages intermodal connections:

- ***To provide a seamless system for cargo deliveries to customers.***
- ***To improve the mobility of people and goods.***
- ***To support Washington's economy by creating and sustaining family-wage jobs and livable communities.***

The state is committed to work in partnership with all publicly- and privately-owned railroads in order to ensure a viable and positive future for freight rail in the state.

Goals, Objectives, Strategies, and Actions

WSDOT goals for freight rail service in the state are presented below with their respective objectives, strategies, and actions. These are aligned, as

appropriate, with the goals and strategies in existing state transportation plans and programs, such as the *2007-2026 Washington Transportation Plan*. Chapter 1 discusses the relationship of this plan with other plans.

These goals, objectives, strategies, and actions were developed in collaboration with many stakeholders, including the Advisory Committee and rail industry representatives, ports, government planners, and other interest groups. The responsibility for implementing these proposed strategies may lie with the public sector, the private sector, the private railroads, or jointly.

The Detailed Goal Matrix developed by the Advisory Committee at their workshops can be found in Appendix 2. The matrix reflects the relationships between the goals, objectives, strategies, and actions.

Economic Competitiveness and Viability

Goal: Support Washington's economic competitiveness and economic viability through strategic freight rail partnerships.

Objectives

- Identify the statewide industry needs for rail transportation.
- Increase integration of freight rail planning at all levels of government.
- Provide access to national markets for state products and cargo entering into the United States (U.S.) or being exported through state ports.
- Increase coordination with private sector partners.
- Identify barriers to the efficient use of freight rail in the state.
- Strategically prioritize the removal of these barriers.
- Improve public-private partnerships at the local, regional, corridor, national, and international levels, enabling a larger investment in freight rail infrastructure than any partner can make by themselves.
- Improve rail system/project assessment and evaluation processes that support state goals and assist the decision-making process.
- Understand the railroad system benefits and investments in transportation.

Strategies

- Increase understanding of the competitive positions of the state's shippers and ports using the state's freight rail system.
- Increase coordination of corridor-level freight rail planning within the state.
- Support multistate freight rail corridor strategic planning partnerships.
- Support and enhance economic partnerships between the state and the rest of the nation and its trading partners.

- Lead and coordinate with the state's ports, shippers, and industry on a continuing basis to identify infrastructure, regulatory, and administrative barriers to their efficient use of the freight rail system.
- Expand the state role to manage, coordinate, and facilitate strategic freight rail infrastructure improvements and investments that are in the public interest.
- Develop the criteria for corridor level freight rail transportation to integrate into the National Rail Plan.

Actions

- Carry out needs analysis to support emerging and existing industries to ensure the freight rail system supports the state's ports and rail-dependent industries.
- Work with the state's MPOs, RTPOs, and tribes to integrate freight rail into future regional transportation plans.
- Work with public and private sector partners in states along any appropriate national corridor to eliminate bottlenecks and improve capacity and velocity inside and outside of this state.
- Establish a process to work and communicate with the ports and industry representatives to coordinate activities at the regional, state, and national level on needed projects, programs, and policy decisions.
- On an ongoing basis and at designated intervals, update planning information with representatives from ports, shippers, railroads, and industry to identify constraints.
- Develop an action plan to address those issues where WSDOT has authority.
- Increase the state ability to develop and manage freight rail system information, research capacity, and data capacity that improves oversight and encourages funding for priority freight rail development.
- Increase public awareness of freight rail as a vital mode of transportation within the supply chain.
- Lead the planning effort to integrate investment decisions with the multiple partners.

Preservation

Goal: Appropriately preserve the ability of Washington's freight rail system to efficiently serve the needs of its customers and to ensure it is available to meet all likely future needs.

Objectives

- Preserve the functionality of the existing rail network.
- Provide access to mainline rail for small customers.
- Create sustainable funding sources for rail preservation and maintenance of low density lines.

- Support long-term economic vitality and diversity.
- Enhance the stewardship of the state-owned abandoned railroad corridor, returning it to active service as soon as feasible.
- Preserve the use of at-risk lines for future rail service.
- Preserve the use of at-risk lines for other public use of corridors (i.e. rails to trails).

Strategies

- Assist all classes of railroads' efforts to maintain and preserve the functionality of tracks, bridges, and rail yards.
- Assist short-line railroads in preserving efficient access to the Class I railroads, ensuring system viability and continuity.
- Ensure long-term preservation of existing industrial land, freight rail corridors, and rights of way for future use.

Actions

- Work with the Class I railroads and other partners to identify at-risk system components that can benefit from public support.
- Support the efforts of Class I railroads to compete for state and federal funding for major capacity preservation projects, when appropriate.
- Provide financial assistance to short-line railroads to maintain and preserve essential rail lines and prevent abandonment, when appropriate.
- Develop plans for at-risk rail corridor maintenance and preservation, including funding strategies.
- Integrate freight rail system development, land use planning and policies, public-private partnerships, and funding strategies consistent with the state vision and policy goals to protect and grow freight mobility.
- Work with ports and railroads to project the functionality and viability of existing connections between port terminals, intermodal rail yards, and mainline tracks.
- Work with short-line and mainline railroads to allow compatible interim use of rail corridor right of way (i.e. rail to trails) within statutory limits, until such time that the right of way is returned to active rail use.
- Acquire rail corridors scheduled for abandonment that have the potential to be reactivated in the future, when appropriate.

Capacity

Goal: Facilitate freight rail system capacity increases to improve mobility, connectivity, reduce congestion, and meet the growing needs of Washington's freight rail users, when economically justified.

Objectives

- Improve freight and passenger mobility.
- Improve connectivity to national and global economies.
- Understand future freight rail volume projections.
- Reduce railroad congestion, eliminating port access bottlenecks, and increasing reliability.
- Improve connectivity to other states and other countries, especially with the areas which Washington State has a competitive advantage.
- Make operational process improvements.
- Improve the overall safety of rail and roads.
- Increase public support for strategic public investment in the freight rail system.
- Increase state funding and implementation of priority projects.

Strategies

- Continue efforts to regularly evaluate freight rail capacity needs.
- Create additional capacity, improve connectivity, and improve operational efficiency by making or supporting targeted infrastructure investments.
- Pursue grade separation of roads and rails, where appropriate.
- Support the implementation of passenger rail projects where investments improve freight rail mobility.
- Use and update existing project assessment tools to include performance measures and benefit/cost analysis to prioritize projects.
- Promote public awareness of and support for freight rail investments that provide economic, mobility, safety, and environmental benefits.
- Support efforts to develop viable federal funding sources for freight rail projects with strategic public benefits.
- Support efforts to enhance state funding sources for freight rail projects with public benefits.

Actions

- Continue working with partners with an interest in freight rail capacity to determine future needs. Assess capacity and use the results to support prioritized investment in freight rail capacity improvements.
- Invest in infrastructure development projects that enable cost-effective, smooth, and efficient transport of freight through multimodal corridors and hubs (i.e. lines, ports, industrial areas).

- Identify and prioritize projects that improve mainline capacity, eliminate bottlenecks, and improve mainline access for ports and other freight rail traffic generators.
- Support the efforts of the state's freight rail providers to solicit state or federal funds for projects that provide needed new capacity, where strategically appropriate.
- Identify grade separation projects that should be included in national, tribal, state, regional, and local transportation plans.
- Work with passenger rail agencies and support funding of projects that support freight movement.
- Use and update the current freight rail project evaluation methodology to prioritize projects.
- Seek public input and develop public support for priority projects.
- Lead efforts to position the state's freight rail system for future federal funding with railroads, ports, shippers, and industry.
- Advocate for the East-West Rail Corridor to be designated by the Federal Government as a Corridor of National Significance.
- Coordinate with multistate stakeholders to obtain federal funding for priority projects along multistate corridors (Northern Tier).[19]
- Work with MPOs and RTPOs to facilitate inclusion of appropriate freight rail projects in metropolitan and regional transportation plans.
- Review programs such as the Freight Action Strategy corridor program and determine WSDOT's role in facilitating public-private partnerships in funding freight rail projects in the state.
- Develop a statewide freight rail advisory body to promote freight rail development.

Energy Efficiency and Environmental

Goal: Take advantage of freight rail's modal energy efficiency to reduce the negative environmental impacts from increased freight movement in Washington while maintaining economic viability.

Objectives

- Improve community health and the environment.
- Create a sustainable transportation system

Strategies

- Identify and implement freight rail projects that decrease targeted emissions, where economically viable.

[19] The Northern Tier refers to the rail corridor that runs through the eight neighboring states from the Pacific Northwest to Chicago. These neighboring states are Washington, Oregon, Idaho, Montana, North Dakota, Minnesota, Wisconsin, and Illinois.

- Encourage rail partners to invest in technologies to reduce their fuel consumption and related air emissions.

Actions

- Develop performance measurements and track achievements.
- Develop an analysis to determine the feasibility and factors that will enable minimizing GHG through modal change from truck to rail.
- Implement rail projects that reduce congested highway traffic, when economically feasible.
- Encourage increased use of locomotive anti-idling devices, electric support equipment, and reduction of wheel/track friction to decrease fuel consumption and air emissions.
- Encourage use of environmentally-friendly switching locomotives in port areas and other rail yards close to residential areas.
- Examine the use of locomotives powered by natural gas.
- Assess the effects of climate change where weather and climate events can impact rail infrastructure and operation.

Safety and Security

Goal: Address the safety and security of the freight rail system and make appropriate enhancements.

Objectives

- Reduce the number of rail-highway, rail-pedestrian, rail-rail, and trespassing incidents.
- Meet federal requirements.
- Improve pedestrian safety and reduce liability.
- Improve emergency recovery and prevention.
- Improve the security of the state rail system in its ability to deter or respond to attacks on rail facilities or domestic targets, while ensuring mobility for all users.
- Reduce the negative impacts from natural disasters.

Strategies

- Continue to identify new focus areas for enhancing rail transportation safety.
- Support the Class I railroads' efforts to meet the federal mandate to install positive train control systems on Class I railroads.
- Continue the Operation Lifesaver partnership to educate the public about rail safety.
- Enhance emergency management, operations, and strategies to be coordinated with Washington Emergency Management.
- Address improvements in rail system security and homeland security.

Actions

- Continue to support safety improvements of rail-highway crossings, signal systems, rail lines, and rail facilities.
- Expand education outreach to new and existing stakeholder groups.
- Continue coordination and support of positive train control systems development.
- Work with railroads and other partners to reduce pedestrian trespassing through educational efforts.
- Work with partners to address rail safety before, during, and after emergencies.
- Review best practices, consult with area experts, work with partners, and develop a list of temporary rail-highway grade crossing closures and alternative routes in the event of emergencies.
- Support railroads, Amtrak, local law enforcement agencies, and others to identify and implement rail security measures based on guidance from existing federal law (PL 110-432), by identifying partnerships and other funding sources to enhance rail system security.

Livable Communities

Goal: Encourage livable communities and family-wage jobs through freight rail system improvements.

Objectives

- Sustain communities through reduced congestion, preserved and expanded infrastructure, economic growth, and optimized safety, security.
- Reduce environmental impacts.

Strategies

- Continue to support local community development improvements that include freight rail options.

Actions

- Support strategic partnerships along the state's rail corridors that improve the quality of life for state residents.

Conclusion

The *Washington State 2010-2030 Freight Rail Plan* lays the foundation for an improved and sustainable freight rail system in the state. The plan does this by identifying a vision for the state's freight rail service and establishing goals, objectives, strategies, and actions to achieve that vision. This vision was accomplished by working with various stakeholders, including the rail industry, shippers, rail advocates, ports,

tribes, governments, elected officials, and many other concerned groups and individuals. This collaboration created a vision that reflects the needs of the community and ultimately to have a responsive, efficient, and sustainable rail transportation network.

Dedicated investment by all partners will be required to reach these goals and accomplish all of the rail improvements identified in this plan.

Washington State Department of Transportation

Chapter 3: Rail System and Freight Rail Services in Washington State

Efficient transportation systems are critical to the economic vitality of the nation. Washington State (state), in particular, relies on multimodal and intermodal transportation for economic development and job creation. As the vital conduit for goods and people, transportation systems influence the long-term competitiveness, viability, and sustainability of economy and quality of life. At the same time, the state encompasses unique environmental richness and biological diversity, resulting in steadily increasing concerns about the impacts of development on vulnerable habitats and ecosystems. A rail system—with advantages from its potential for mass movement of people and goods, higher efficiency on energy use, and relatively lighter environmental emissions—could play an increasing role in development of a highly efficient and environmentally-friendly transportation system. Policies and decisions in transportation investment are embracing rail as a viable component and option to meet the challenges in transportation planning, design, construction, operation, maintenance, and regulation.

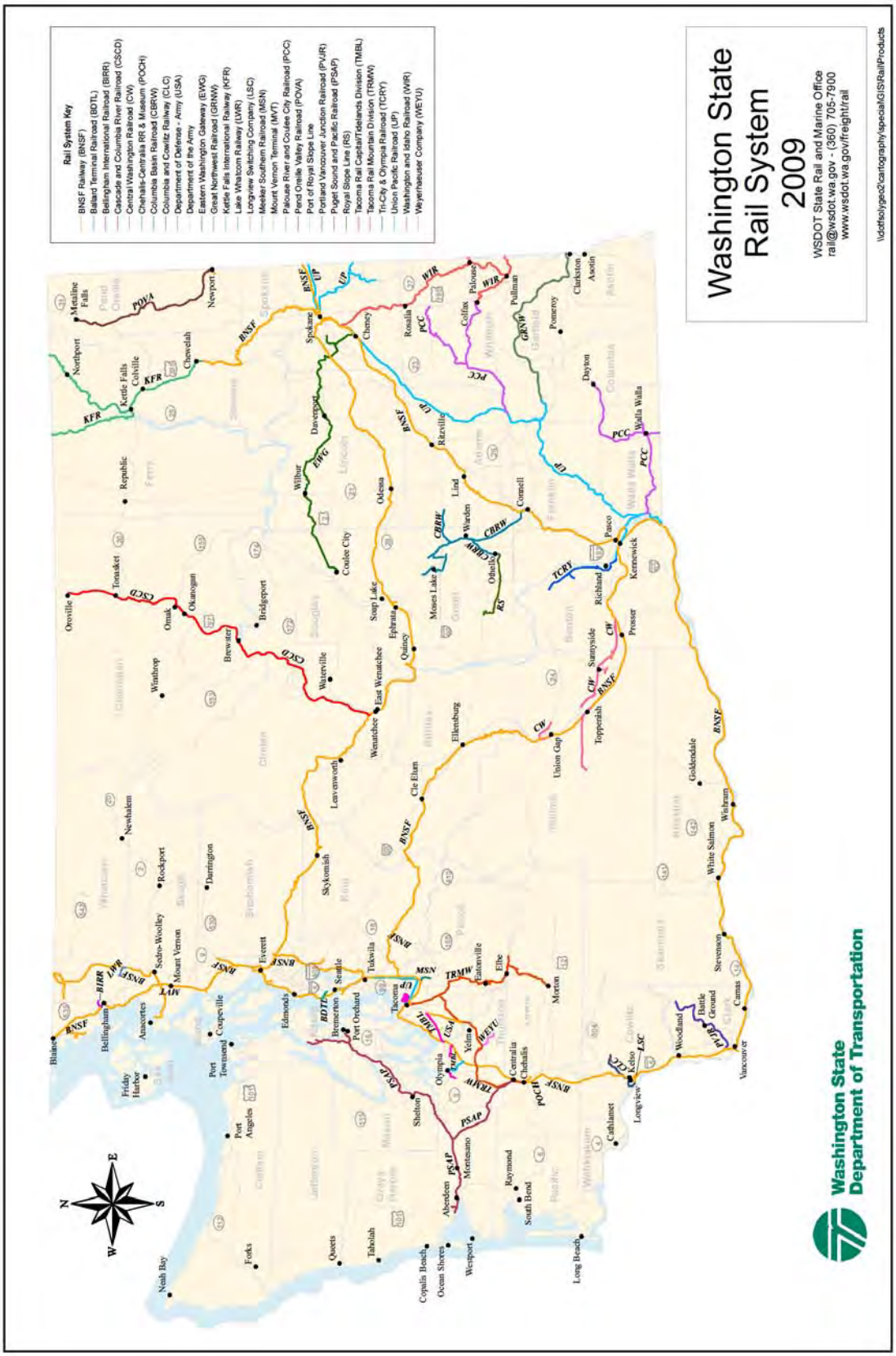
Overview of Washington State Rail System Services

From 1828 to present, the rail system in the United States (U.S.) has expanded and contracted to meet the needs of a growing nation, influenced by public and private interests. Mileage peaked in the 1920s at approximately 380,000 miles of track. Since then the rail network has been modernized and downsized to a core network that is less than half of its peak size. Appendix 3-B contains a brief history of national and state rail development.

The state's rail network has evolved over the last century to serve a wide range of passenger and freight markets and has extended across many parts of the state. Thirty-two of the state's 39 counties are served by one of the state's freight railroads. The rail network in the state has three distinct types of rail services: intercity passenger, commuter, and freight. There are two mainline freight railroads—the BNSF Railway Company (BNSF) and the Union Pacific Railroad (UP)—and 19 active short-line railroads operating in the state.

Exhibit 3-1 depicts the railroad network in the state.

Exhibit 3-1: Washington State Rail System



Rail transportation supports economic competitiveness and economic viability. In 2007 freight railroads operating in the state carried 116 million tons of freight over 3,647 operated route miles. It accounts for 19 percent of total freight in the state. Passenger rail services share rail lines with freight in the state. In 2008 intercity passenger rail, including the Amtrak *Cascades*, *Empire Builder*, and *Coast Starlight*, provided services to more than one million riders who leave, arrive, travel through, or travel within state. Since September 2000, Sound Transit's *Sounder* has provided commuter rail service in the Puget Sound area. In 2008 *Sounder's* ridership was 16.13 million.

Freight Service

The state freight rail system consists of mainlines, branch lines, industrial spurs and leads, and rail yards and terminals operated by a variety of public and private rail carriers (see Exhibit 3-1). The freight railroads operate over 3,647 miles of rail service in the state over 2,418 miles of rail lines.[1] Long-haul rail transportation is provided by two Class I railroads—BNSF and UP.[2] The BNSF owns and operates the most mileage in the state—1,604 in-state-operated miles, constituting 5 percent of the BNSF's total system mileage. The dominant position of BNSF in many of the state's rail markets has significant implications for the degree of leverage that the state, rail shippers, and communities have in influencing its business decisions.

Both of the Class I railroads are served by a number of smaller regional, short-line, and terminal railroads, which pick up and distribute rail cars to individual industrial and agricultural shippers and receivers. These railroads provide critical services, particularly in lower-density rail corridors and markets where the Class I railroads cannot operate cost-effectively. In most of cases, the short lines operate on branch lines that were previously owned and operated by the Class I railroads.

Freight Rail Volume and Flows

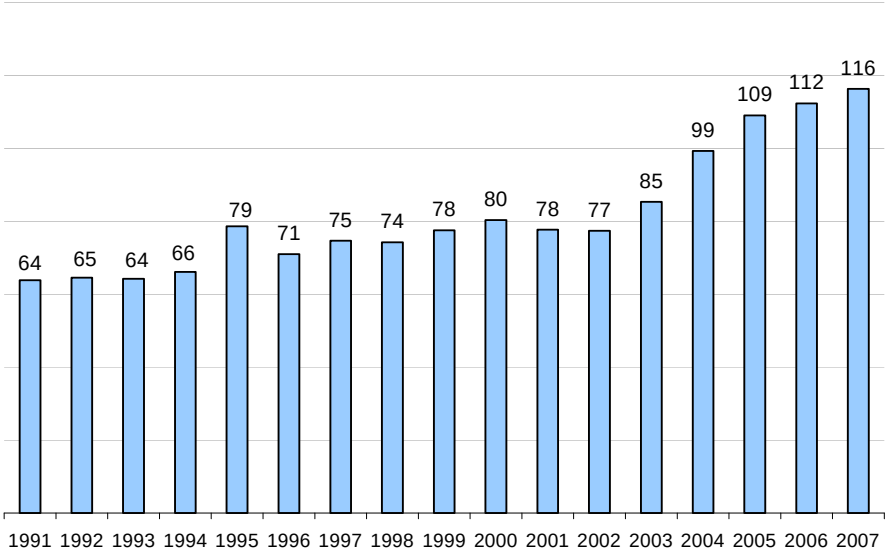
Freight rail transportation is a fast growing service. In 2007 the state rail system carried 116 million tons of freight, compared with 64 million tons

[1] Due to the fact that owner railroads lease operating rights over their lines to other railroads, operated miles are greater than owned miles. In a few areas, the U.S. Department of Transportation (USDOT) Surface Transportation Board (STB) has mandated provision of operating rights to ensure competition between railroads.

[2] The USDOT STB defines Class I railroads as having annual carrier operating revenues of $250 million or more. Class II railroads, often referred to as a regional railroad, have annual carrier operating revenues of less than $250 million but in excess of $20 million. Class III railroads, or short lines, have annual carrier operating revenues of $20 million or less. Switching or terminal railroads are railroads engaged primarily in switching and/or terminal services for other railroads.

in 1991, accounting for an average annual growth rate of 3.8 percent (Exhibit 3-2). However, the current economic recession has impacted freight transportation. Although current freight rail volumes are not available at the state level, other data indicates a sharp decline for 2008 and 2009. Therefore, the long-term growth rate is likely to be mild, in the range of 2 percent.

Exhibit 3-2: Washington State Rail Freight
1991 to 2007 (Million Tons)



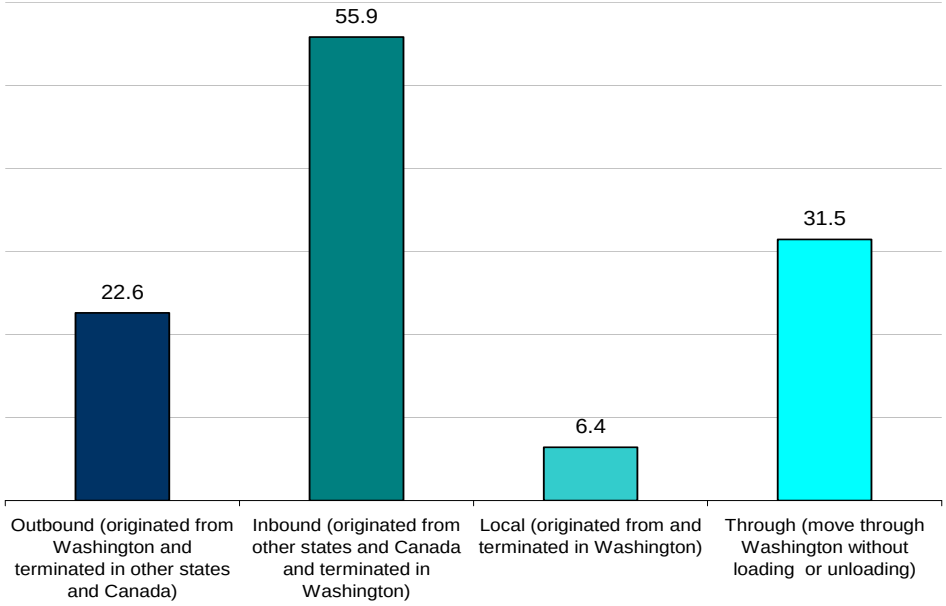
Source: Washington State Department of Transportation (WSDOT) State Rail and Marine Office and Association of American Railroads

Among the 116 million tons of rail freight, 56 million tons arrived in the state from 44 other states and Canada, while almost 23 million tons shipped from the state to 46 other states and Canada. Over 6 million tons of rail freight moved within the state's borders and almost 32 million tons of rail freight moved through the state without loading and unloading (Exhibit 3-3).

Of the 116 million tons of rail freight, 86 million tons, or 74 percent, is intermodal[3] traffic, while 30 million tons, or 26 percent, is rail only (single mode) traffic (Exhibit 3-4).

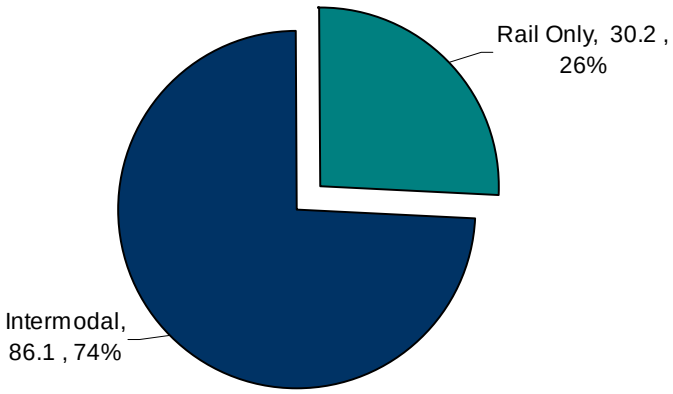
[3] Intermodal is using more than one transportation mode such as rail and truck. In this chapter the reference to intermodal is not limited to intermodal container traffic. It is all rail that also has another mode of transport used in the movement of the cargo.

Exhibit 3-3: Rail Freight Flows in Washington State – 2007
(Million Tons)



Source: WSDOT State Rail and Marine Office – 2007 STB Waybill Data Analysis

Exhibit 3-4: Freight Rail Intermodal Traffic – Washington State 2007
(Million Tons)



Source: WSDOT State Rail and Marine Office – 2007 STB Waybill Data Analysis

Washington State Freight Rail System Profiles

This section profiles the 22 active freight railroads operating in the state, along with one inactive railroad. This section also examines the mainline corridors where they operate and then the lower density corridors. The mainline corridors connect the state with the rest of the North American rail network, while the lower density corridors offer collection/distribution services and access to key industries. Finally, the principal terminals and yards impacting state rail traffic are described.

Railroad Classification

The state is served by two Class I freight railroads, BNSF and UP. These two railroads provide the primary connections between the state's ports, farmers, and industries and the rest of North America. This is done over a series of ten major rail corridors within the state; seven cross the state east-to-west, while the other three parallel Interstate 5 (I-5) on the western side of the state. The BNSF operates seven of these corridors, while the UP operates the remaining three corridors. These corridors are profiled in the BNSF and UP sections, respectively.

There is one Class II (regional) railroad operating in the state. The Montana Rail Link offers limited service in the state and only reaches Spokane over trackage rights on BNSF track from Idaho.

The 19 active Class III (short-line and terminal/switching) railroads in the state provide important collector/distributor services for the larger railroads and local rail services for state shippers. Their range varies from lines that operate over 100 miles in the state to switching railroads that connect ports to line-haul railroads inside a yard. Exhibit 3-5 is a list of the state's railroads and their mileage and class.

Track Mileage Inventory

Exhibit 3-5 also summarizes railroad mileage, including miles operated (owned track and trackage rights) and miles of road[4] owned in the state. BNSF[5] owns the most mileage in the state, but the 1,505 in-state miles represents only five percent of BNSF's total system mileage. In total, freight railroads operate over 3,647 miles and own 2,418 miles of trackage in the state.

[4] "Miles of road" is a linear measure of distance that does not consider the number of tracks.
[5] BNSF Railway Co. Annual Report to the Utilities and Transportation Commission (UTC), 2008.

Exhibit 3-5: Washington Freight Railroads, Mileage, and Class[6]

Name	Reporting Mark	Mileage in Washington State		Class
		Operated[a]	Owned	
Ballard Terminal Railroad	BDTL	3	0	III
BNSF Railway	BNSF[b]	1,604	1,505	I
Cascade & Columbia River Railroad	CSCD	135	135	III
Central Washington Railroad Company	CWA	83	0	III
Columbia & Cowlitz Railway	CLC	8.5	8.5	III
Columbia Basin Railroad	CBRW[c]	124	0	III
Eastern Washington Gateway RR	EWG	108	0	III
Great Northwest Railroad	GRNW	58	58	III
Kettle Falls International Railway	KFR	142	58	III
Longview Switching Company	LSC	17	0	III
Meeker Southern Railroad	MSN	5	5	III
Montana Rail Link	MRL	16	0	II
Mount Vernon Terminal Railroad	MVT	2	2	III
Palouse River & Coulee City Railroad	PCC	169	0	III
Pend Oreille Valley Railroad	POVA	61	61	III
Puget Sound & Pacific Railroad	PSAP[d]	178	109	III
Royal Slope Railroad (Inactive)	RS	26	26	III
Tacoma Municipal Belt Line	TMBL	72	36	III
Tacoma Rail Mountain Division	TRMW	134	134	III
Tri-City & Olympia Railroad	TCRY	56	0	III
Union Pacific Railroad	UP	558	280	I
Washington & Idaho Railway Inc.	WIR	87		III
Western Rail Switching	WRS			III
Total		**3,647**	**2,418**	

[a] Miles operated includes all owned track plus trackage rights.
[b] Per BNSF's report to the STB, December 31, 2008.
[c] Includes Portland Vancouver Junction Railroad's 33 miles of trackage rights.
[d] Includes U.S. Navy's Shelton-Bangor line.

Source: *Railroad Service in Washington*, Association of American Railroads, 2007. This information was then updated using BNSF timetables, UP timetables and charts, Amtrak charts, and STB filings for short-line railroads.

[6] Excludes standard gauge track operated as a light rail system.

Freight Rail Service Corridors

The state currently has ten major rail corridors and 12 low-density corridors. These corridors are defined and operated by BNSF and UP. Exhibit 3-6 lists all the corridors. Appendix 3-B has a description of each rail service corridor. While these rail corridors are defined by private railroads, the state has an interest in defining rail corridors in terms of public benefits. The Freight Mobility Strategic Investment Board is authorized to define strategic rail corridors and update them periodically. Some short-line routes are critical to the economic viability of local communities and certain industries. The state needs to develop criteria to define rail corridors in terms of their impacts on the state's economic and societal needs, as discussed in Chapter 5.

Exhibit 3-6: Rail Service Corridors in Washington State

Railroads	Major Corridors	Low-Density Corridors
BNSF	Seattle-Spokane	Tukwila-Snohomish
	Seattle-Portland, Oregon (OR)	Woodinville-Redmond
	Portland, OR-Pasco	Burlington-Sumas
	Auburn-Pasco	Sumas-Lynden
	Pasco-Spokane	Burlington-Anacortes
	Spokane-Sandpoint, Idaho (ID)	Intalco-Cherry Point
	Everett-Vancouver, British Columbia (B.C.)	Marysville-Arlington
		Lakeview-Roy
		Spokane-Chewelah
UP	Hinkle, OR-Spokane	Spokane-Plummer, ID; Manito-Fairfield
	Spokane-Eastport, ID	Ayer Junction-Riparia
	Tacoma-Seattle	Wallula-Kennewick

Source: *Statewide Rail Capacity and System Needs Study* (2006)

Railroad Profiles

Appendix 3-B also contains more information about the freight rail carriers in the state including descriptions, maps, revenue, and history.

Class I Railroads

BNSF Railway

BNSF, one of the four largest U.S. railroads, owns and operates track over seven major corridors and nine low-density corridors in the state. BNSF

operates almost 44 percent of the state's total system route miles.[7] Primary commodities include coal, agricultural products, intermodal (containers/ trailers), forest products, chemicals, metals, and minerals. According to BNSF's annual report, 2008 revenue totaled $17.5 billion.[8] In the state BNSF reported total interstate operating revenue of $1,040,184 and total gross intrastate operating revenue of $97,876,862, according to their 2008 Annual Report to the UTC.

Union Pacific Railroad

The UP is the largest railroad in North America. Primary commodities moving through the state include chemicals, coal, food and food products, forest products, grain and grain products, intermodal, metals and minerals, and automobiles and parts. The UP reported 2008 revenue as $18 billion.

Class II and Class III Railroads

Ballard Terminal Railroad

The Ballard Terminal Railroad (BDTL[9]) is a Class III railroad in Seattle. The BDTL reported total interstate operating revenue of $6,148 and $70,012 for total gross intrastate operating revenue in their 2008 Annual Report to the UTC.

Cascade and Columbia River Railroad

The Cascade and Columbia River Railroad (CSCD) is a Class III railroad that interchanges with the BNSF in Wenatchee and runs north to Oroville. Primary commodities are limestone, pulp wood and lumber products. CSCD reported total gross intrastate operating revenue of $1,614,149 in their 2008 Annual Report to the UTC.

Central Washington Railroad

The Central Washington Railroad (CWA) is a Class III railroad in the Yakima Valley. The CWA carries cattle feed, propane, paper products, plastic pellets, cheese, juice concentrate, lumber, apples, and other agricultural goods.[10] The CWA reported total interstate operating revenue of $1,436,210 and total gross intrastate operating revenue of $374,225 in their 2008 Annual Report to the UTC.

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[7] BNSF Railway 2008 Annual Report to the Utilities and Transportation Commission.
[8] www.bnsf.com/investors/investorreports/2Q_2009_Investors_Report.pdf
[9] BDTL is the reporting mark for Ballard Terminal Railroad. A reporting mark is a two-to-four-letter alphabetic code used to identify owners or lessees of rolling stock and other equipment used on the North American railroad network. The marks are stenciled on each piece of equipment, along with a one-to-six-digit number, which together uniquely identify every such rail car. This allows the cars to be tracked by the railroad they are traveling over, which shares the information with other railroads and customers.
[10] http://www.temple-industries.com/companies/central_washington_railroad.php/.

Columbia and Cowlitz Railway

The Columbia and Cowlitz Railway (CLC), a wholly-owned subsidiary of Weyerhaeuser Company, is a Class III railroad that moves freight from the Weyerhaeuser Company mill in Longview to the junction just outside the city limits of Kelso.[11] Primary commodities include forest products, steel, and chemicals. The CLC reported total gross intrastate operating revenue of $2,654,693 in their 2008 Annual Report to the UTC.

Columbia Basin Railroad

The Columbia Basin Railroad (CBRW) is a Class III railroad located near Moses Lake, serving Connell, Warden, Bruce, Schrag, and Othello. The CBRW hauls agricultural goods, inbound fertilizer, chemicals, and processed potatoes and vegetables. The CBRW reported total interstate operating revenue of $4,240,109 and total gross intrastate operating revenue of $787,720 in their 2008 Annual Report to the UTC.

The Portland Vancouver Junction Railroad (PVJR) is a newly formed, wholly-owned subsidiary of CBRW. It is owned by Clark County, serving the Vancouver area since 2004. The Chelatchie Prairie Railroad (BYCX), a tourist railroad, operates passenger excursions between Lucia and Yacolt on weekends and holidays.

Eastern Washington Gateway Railroad

The Eastern Washington Gateway Railroad (EWG) is a Class III railroad that operates a 108-mile branch line that extends from Cheney to Coulee City. Wheat and barley are the principle commodities shipped. It is one of three branch lines of the Palouse River & Coulee City Railroad System owned by the state. The EWG reported total interstate operating revenue of $1,803,601 in their 2008 Annual Report to the UTC.

Great Northwest Railroad

The Great Northwest Railroad (GRNW), a Class III railroad, moves freight between Lewiston, ID, Riparia, and Ayer, interchanging with both the BNSF and UP mainlines in Ayer. Primary commodities are forest products consisting of lumber, bark, paper and tissue, agricultural products, industrial and farm chemicals, scrap iron, and frozen vegetables. The GRNW reported total interstate operating revenue of $3,962,836 in their 2008 Annual Report to the UTC and reported total gross intrastate operating revenue of $113,584.

Kettle Falls International Railway

The Kettle Falls International Railway, LLC (KFR), a Class III railroad, moves freight from the BNSF interchange at Chewelah to Columbia Gardens, British Columbia (B.C.). A second line operates from Kettle Falls to Grand Forks, B.C. Primary commodities include lumber,

[11] http://en.wikipedia.org/wiki/Columbia_and_Cowlitz_Railway/.

plywood, wood products, minerals, metals, fertilizer, industrial chemicals, and abrasives.[12] KFR reported total interstate operating revenue of $4,319,638 and total gross intrastate operating revenue of $460,891 in their 2008 Annual Report to the UTC.

Longview Switching Company

The Longview Switching Company (LSC), a jointly-owned subsidiary of BNSF and UP, is a Class III railroad. The LSC switches trains approximately five miles from the railroad mainlines into the Port of Longview.[13] The LSC reported estimated annual revenue of $1,600,000 in 2008.

Meeker Southern Railroad

The Meeker Southern (MSN) is a 5-mile Class III railroad that connects Meeker Junction in Puyallup with an industrial park in McMillan. The MSN is a wholly-owned subsidiary of the Ballard Terminal Railroad. MSN reported no total gross intrastate operating revenue, but did report $181,796 in interstate operating revenue.

Montana Rail Link

Montana Rail Link (MRL) is a Class II regional railroad that connects with the BNSF at Spokane. MRL is an independently-owned unit of the Washington Companies, headquartered in Missoula, Montana.[14] MRL reported total intrastate revenue of $4,434,250 in 2008.

Mount Vernon Terminal Railway

The Mount Vernon Terminal Railway (MVT) is a Class III railroad providing service and interchanges with BNSF at Mount Vernon. The railroad consists of a 3-track wide yard used for storage and transloading. MVT reported total interstate operating revenue of $61,174 and no intrastate operating revenue.

Palouse River & Coulee City Railroad

The Palouse River and Coulee City Railroad Company (PCC), a subsidiary of Watco Companies operates this Class III railroad, which contains a total of 84 miles of mainline track. PCC reported total interstate operating revenue of $1,479,726 and $355,186 intrastate operating revenue.

Palouse River & Coulee City Railroad System

The Palouse River & Coulee City Railroad System is owned by the state. It is comprised of three Class III railroad lines: the PV Hooper (operated by PCC), CW (operated by EWG), and P&L (operated by WIR).

[12] http://www.omnitrax.com/rail_kfr.aspx/.
[13] http://en.wikipedia.org/wiki/Port_of_Longview/.
[14] http://www.montanarail.com/general_info.htm/.

Pend Oreille Valley Railroad

The Pend Oreille Valley Railroad (POVA) is a Class III railroad, moving freight between Metaline Falls, Newport, and Dover, Idaho on owned and leased trackage. POVA also hosts occasional tourist trains between Ione and Metaline Falls. POVA reported a total interstate operating revenue of $1,899,339 and total gross intrastate operating revenue of $506,001.

Puget Sound and Pacific Railroad

The Puget Sound and Pacific Railroad (PSAP) is a Class III railroad headquartered in Elma. Its main commodities include lumber, logs, and chemicals for the pulp and paper mills. PSAP reported interstate operating revenue of $8,115,618 and total gross intrastate operating revenue of $64,840.

The PSAP also operates on United States Government (Navy) trackage from Shelton to Bangor and on a spur to the U.S. Navy base at Bremerton.

Royal Slope Railroad

The Royal Slope Railroad (RS) is a Class III railroad owned by the state. It connects Royal City to the Columbia Basin Railroad at Othello. The line currently is inactive, but could play a role in future freight rail development.

Tacoma Rail

Tacoma Rail is comprised of two Class III railroads with three distinct and separate divisions—Tidelands Division, Mountain Division, and the Capital Division. The Tacoma Municipal Belt Line (TMBL), which includes the Tidelands and Capital Divisions, is owned by the city of Tacoma, Public Utilities. The Tacoma Rail Mountain Division (TRMW) is owned by the city of Tacoma and operated by Tacoma Rail. TMBL reported a total interstate operating revenue of $14,359,192 and total gross intrastate operating revenue of $785,908 in 2008. TRMW reported a total interstate operating revenue of $539,950 and total gross intrastate operating revenue of $118,641 in 2008.

Tri-City and Olympia Railroad

The Tri-City and Olympia Railroad (TCRY) is a Class III railroad that serves the Richland area, including the Port of Benton and the U.S. Department of Energy. In 2009 the Olympia line ceased operations. Major commodities include agricultural products, grain, feed stock, food and beverages, consumer products, wood products, paper, coal and minerals, building materials, machinery and equipment, vehicles, chemicals, fertilizer, waste and scrap, and nuclear waste as bulk goods, break bulk materials, and liquids.[15] The TCRY reported no total gross intrastate operating revenue in their 2008 Annual Report to the UTC.

[15] Tri-City and Olympia Railroad, www.tcry.com/.

Washington and Idaho Railway, Inc.

The Washington and Idaho Railway (WIR), a Class III railroad, operates the P&L Branch of the Palouse River and Coulee City Railroad System south of Spokane, connecting with BNSF in various locations. Primary commodities are fertilizer, beans and lentils, and forest products. The WIR reported total gross intrastate operating revenue of $824,945 in their 2008 Annual Report to the UTC.

Western Rail Switching

Western Rail Switching (WRS) is a switching and terminal railroad owned by Western Rail, Inc., a used locomotive seller located on the line. In 2004, Spokane County bought BNSF's Geiger Spur and designated WRS to operate it. In January 2009, realignment bypassed Fairchild Air Force Base, through which the spur had run. The west end of the spur now connects to the Eastern Washington Gateway Railroad (EWG) near Medical Lake. EWG now operates the Geiger Spur. WRS continues as an operating business.

Intermodal Facilities, Railroad Terminals, and Rail Yards

Freight terminals are facilities where freight cars are gathered up into trains or where trains are broken down so that cars can be distributed to shippers. Intermodal facilities are locations where freight containers or trailers are transferred between freight modes involved in the intermodal freight trip. Typically, this includes some combination of rail, truck, and water modes. Rail yards are facilities where individual rail cars are grouped together (blocked) by destination and then made up into trains containing many blocks of cars.

Intermodal Facility

The STB defines an intermodal facility as a site consisting of tracks, lifting equipment, paved and/or unpaved areas, and a control point for the transfer (receiving, loading, unloading, and dispatching) of trailers and containers between rail and highway and between rail and truck to/from marine modes of transportation.

There are three primary forms of containers for freight intermodal traffic between rail and highway modes:

- **RoadRailers®** – a specialized truck trailer where the trailer can be attached to rail wheels to haul along the railroad without the use of a separate rail flat car. At the intermodal facility, the trailer can be detached from the rail wheels and driven via truck to its final destination.

- **Trailer on flat car** – a standard truck trailer or container on a chassis loaded onto a flat rail car and hauled to a facility, where it is unloaded from the rail flat car and hauled by truck to its final destination.
- **Container on flat car** – a standardized container loaded onto a flat car or stack car, where it is moved by rail to an intermodal facility and unloaded from the rail car, placed on a rubber-tired highway chassis, and hauled by truck to its final destination.

Standardized containers facilitate the transition between modes of transportation. These standardized containers can be loaded onto and from an ocean-going vessel in a very efficient manner. These same containers can be attached to either a rail chassis or truck trailer chassis to be hauled by rail or truck to their final destination. Container sizes are 8 feet wide and typically 8 feet, 6 inches tall. "Hicube" containers are 9 feet, 6 inches tall. Lengths can vary from 20 feet to 56 feet. A limitation to the container lengths is the maximum allowable trailer lengths in the U.S.

There are 119 intermodal facilities in the state based on U.S. Bureau of Transportation Statistics data. There are 95 intermodal facilities that include freight rail mode. Exhibit 3-7 displays the sites of these intermodal facilities.

Appendix 3-C provides details of these intermodal facilities and commodities and shipments associated with these freight rail intermodal facilities.

Railroad Terminals and Yards

Terminals and yards serve many functions for the railroads. They originate and terminate traffic by building outbound trains and breaking down inbound trains. They are used to classify inbound cars for assignment to outbound trains for through traffic. Yards can offer refueling, crew change, storage, and maintenance functions. Given this key role in the rail network, a significant amount of rail capacity is impacted by the size and efficiency of the terminals and yards.

Exhibit 3-8 summarizes the major terminals and yards that have the most impact on state railroad movements. This table includes the owner, yard/terminal name, location, and function.

Exhibit 3-7: Rail Intermodal Facilities in Washington State

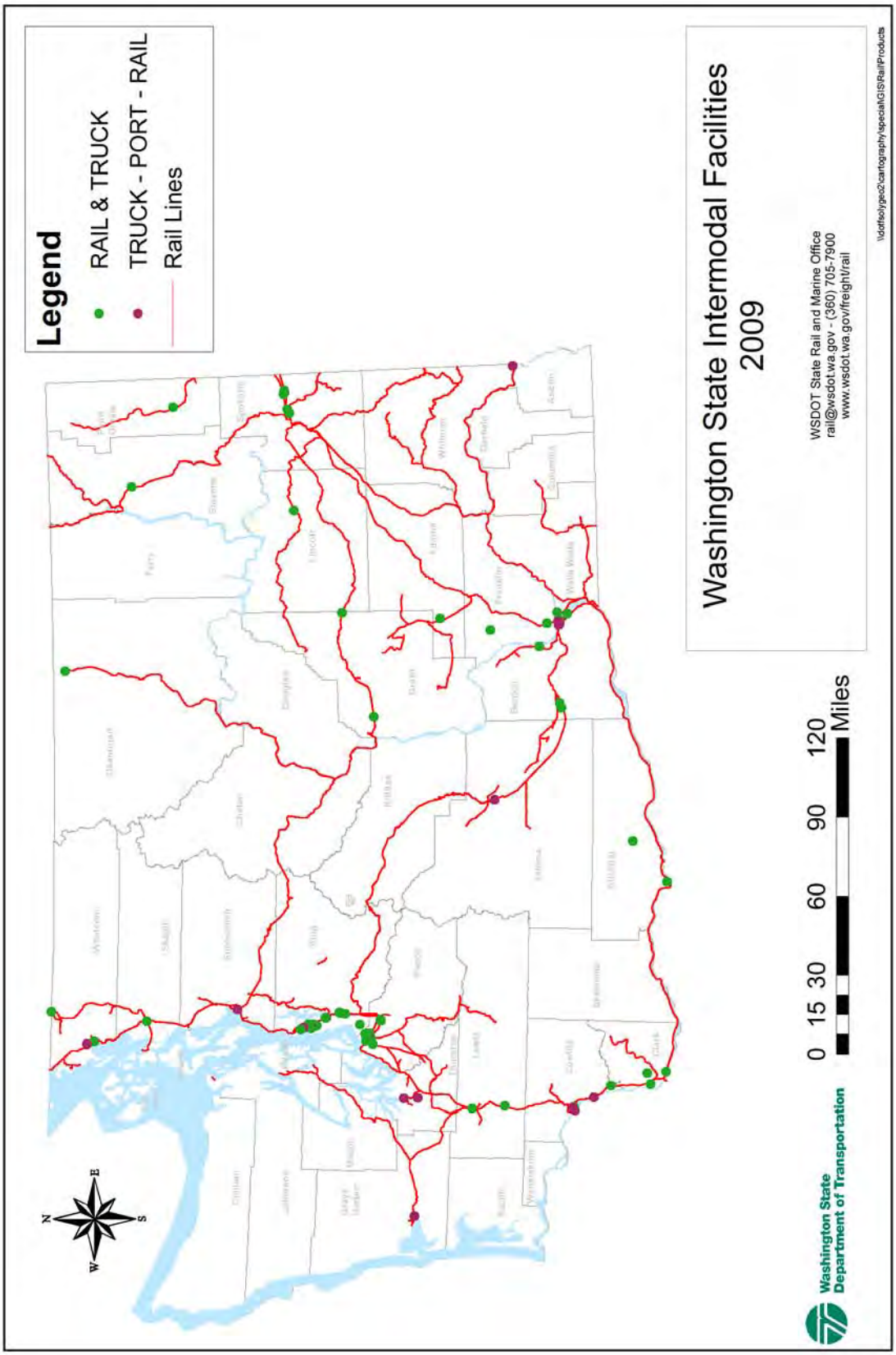


Exhibit 3-8: Railroad Terminals and Yards Impacting Washington State Rail Movements

Owner	Yard/Terminal	Location	Function
BNSF	Bayside/Delta Yards	Everett	Everett generates some traffic locally, but is principally a classification yard for through traffic. It is the southern endpoint for most through traffic on the Everett-Vancouver, B.C. route. Generally traffic from south and east of Everett arrives in Bayside Yard, where it is switched, and made up into trains for north of Everett. Traffic from north of Everett arrives in Delta Yard, where it is switched and made up into trains for south and east of Everett.
BNSF	Hauser Yard	Hauser, ID	Hauser Yard is not important as a terminal; however, it is important as a fuel station and crew change point. Westward trains stop for fuel, providing sufficient fuel for a trip to Seattle, Tacoma, Kalama, Longview, Vancouver, Washington (WA), Portland, Oregon (OR), or Pasco and return. Eastward trains stop for fuel, providing sufficient fuel to reach the next fueling station at Havre, Montana.
BNSF	Pasco Yard	Pasco	Pasco processes traffic to and from local industries and is the BNSF classification yard for carload traffic moving to and from Washington State. Virtually all traffic handled by Pasco Yard is originating from classified traffic or terminating for classification. Pasco also is a crew change point for through trains (generally grain and intermodal trains).
BNSF	East St. Johns	Portland, OR	East St. Johns processes traffic for local industries and is an interchange point for traffic moving between BNSF and UP. Traffic is a combination of through trains and transfers.
BNSF	Lake Yard	Portland, OR	BNSF Lake Yard is adjacent to the Portland Terminal Railroad Lake Yard. It is the BNSF intermodal terminal for the Portland area. Traffic is generally originating and terminating trains.
BNSF	Willbridge	Portland, OR	Willbridge processes traffic for local industries. Traffic is a combination of through trains and yard transfers.
BNSF	Balmer Yard	Seattle	Balmer Yard at Interbay is primarily a classification yard for the Portland-Seattle route. Traffic from the south is distributed to local industries or forwarded to Everett for further classification and forwarding. Traffic from the north is classified by destination station between Seattle and Portland and made up onto trains. Traffic processed by Balmer Yard is generally originating and terminating only. Interbay also is a crew change point for through trains that do not originate or terminate in Seattle terminal. The primary commodity at Balmer is grain hauled for Cargill.

Owner	Yard/Terminal	Location	Function
BNSF	Seattle International Gateway Terminal	Seattle	The Seattle International Gateway (SIG) is the BNSF international intermodal terminal in Seattle. Containers are drayed to and from the Port of Seattle terminals. This traffic is originating and terminating only.
BNSF	South Seattle Domestic Intermodal Yard	Seattle	The South Seattle Domestic Intermodal Yard processes domestic cargo traffic in 53-foot (vs. 40- to 48-foot) containers.
BNSF	Stacy Street Yard	Seattle	Stacy Street Yard is in the same physical location as SIG. Stacy Street Yard is the terminal used by most local industry traffic originating and terminating in Seattle. Traffic to and from Seattle industries south of King Street Station and in West Seattle is processed at Stacy Street Yard. Traffic is generally originating and terminating only.
BNSF	Yardley	Spokane	Yardley processes cars to and from local industries and is a block swap location for intermodal trains. Train traffic is a mixture of originating, terminating, and through trains, including through trains that stop for block swapping as well as setout or pickup. Yardley is a crew change point for through trains.
BNSF	Tacoma Yard	Tacoma	Tacoma Yard processes traffic for Tacoma industries in the Tideflats area west of the Puyallup River. It also is the classification yard for traffic originating and terminating in the Tacoma Rail yard. Traffic arrives in Tacoma from through or terminating trains and the Tacoma Rail traffic is delivered after the train has been switched (sorted). Carload traffic from Tacoma Rail is switched by destination and forwarded on the appropriate train. Traffic is a mixture of originating, terminating, and through.
BNSF	Vancouver Yard	Vancouver, B.C.	Vancouver Yard processes traffic to and from local industries in Vancouver, B.C., and the Port of Vancouver. Traffic is a combination of originating, terminating and through trains that set out and pick up cars.
BNSF	Vancouver Yard	Vancouver, WA	The Vancouver Yard has locomotive maintenance and fueling facilities. It serves as a major switching yard for BNSF railway in the Portland/Vancouver metro area. Vancouver also is a crew change point for through trains moving between the Portland-Seattle route and the Portland-Pasco route.
BNSF	Wenatchee Yard	Wenatchee	Wenatchee Yard processes cars to and from local industries and is the interchange point for traffic moving between BNSF and Cascade & Columbia River Railroad. Traffic is originating and terminating trains. Wenatchee also is a crew change point for through trains.

Owner	Yard/Terminal	Location	Function
Canadian National	Thornton Yard	Surrey, B.C.	This is the northern endpoint for virtually all through traffic on the Everett-Vancouver, B.C. route. Traffic is generally originating and terminating only.
Longview Switching Company	Longview Yard	Longview	Longview Switching Company (jointly owned by BNSF and UP) processes all traffic to and from the Port of Longview and local industries. All traffic is transfer movements between Longview Junction yard and Longview Yard.
Longview Switching Company	Longview Junction Yard	Longview	Longview Junction Yard is the interchange point among Longview Switching Company, BNSF, and UP. It also processes local industry traffic for Ridgefield, Woodland, and Kalama, and interchange traffic to and from Columbia & Cowlitz Railway in Rocky Point. Traffic is a combination of originations and terminations, and traffic arriving or leaving on through trains.
Port of Kalama	Kalama Export Company Terminal	Kalama	The Kalama Export grain terminal (also known as Peavey) can accommodate five grain trains of about 108 cars each and can unload six trains in 24 hours. Traffic is generally originating and terminating only.
Port of Kalama	Cenex-United Harvest Terminal	Kalama	The Cenex-United Harvest grain terminal can accommodate two grain trains of about 108 cars each and can unload two trains in 24 hours. Traffic is generally originating or terminating only.
Port of Portland	Port of Portland	Portland, OR	Port of Portland has several marine terminals and industrial sites that generate traffic directly related to Washington State rail operation. These facilities are connected to BNSF at North Portland Junction and to UP at Barnes. Traffic is a combination of complete trains and traffic to and from through trains.
Port of Seattle	Terminal 5 Intermodal Yard	Seattle	Terminal 5 Intermodal Yard is a Port of Seattle on dock international terminal. BNSF provides the switching service. UP currently has the contract for all traffic originating and terminating at this terminal. Traffic is originates and terminates in this yard.
Port of Tacoma	Port of Tacoma Intermodal Yard	Tacoma	Port of Tacoma has four intermodal yards supporting marine terminals in the Tideflats area. Trains originate or terminate directly in these yards.
Portland Terminal Railroad	Lake Yard	Portland, OR	Lake Yard processes traffic for local industries and serves as an interchange point for BNSF and UP. Traffic is generally originating and terminating trains and yard transfers.
Tacoma Rail (TMBL)	Tideflats Yard	Tacoma	Tideflats Yard switches traffic originating and terminating in the Tacoma Tideflats area east of the Puyallup River, adjacent to the Port of Tacoma intermodal terminals. Traffic is transfer movements between the Tideflats customers and the BNSF and UP.

Owner	Yard/Terminal	Location	Function
UP	Albina Terminal	Portland, OR	Albina processes traffic to and from Portland area industries on UP. It also is one of two UP intermodal terminals for the Portland area. Traffic is generally originating and terminating trains and yard transfers.
UP	Argo Yard	Seattle	Argo Yard also includes subyards Manar and Van Asselt. Argo is the UP intermodal terminal (domestic and international) in Seattle as well as a truck to rail transfer station for solid waste. Argo Yard is almost exclusively used for intermodal traffic and interchanges between BNSF and UP. Van Asselt and Manar yards are used for carload freight originating and terminating at industries on UP in Seattle and Tukwila. Traffic is generally originating and terminating only.
UP	Barnes	Portland, OR	Barnes processes traffic for local industries and the Port of Portland terminals and is an interchange point for traffic moving between BNSF and UP.
UP	Brooklyn Terminal	Portland, OR	Brooklyn is one of two UP intermodal terminals in Portland, Oregon. Traffic is generally through trains with setouts and/or pickups.
UP	Hinkle Yard	Hinkle, OR	Hinkle Terminal is located just southeast of the Tri-Cities in Oregon. It has a major classification yard for carload freight. UP also has a major diesel locomotive maintenance, repair, and fueling facilities in Hinkle. It is also a crew change point for UP trains.
UP	Spokane Yard	Spokane	Spokane Yard processes cars to and from local industries. Train traffic is generally originating and terminating trains. Spokane is a crew change point for through trains.
UP	Tacoma/Fife Yards	Tacoma	The UP Tacoma terminal is split between two yards. The Tacoma Yard processes carload traffic to and from the Tacoma Tideflats area west of the Puyallup River. The Fife Yard processes carload traffic for industries east of the Puyallup River and on Tacoma Rail. Traffic is a combination of originating/ terminating and traffic arriving or leaving on through trains.

Capacity of the Washington State Rail System

Exhibit 3-9 compares the average number of trains operated on each Class I railroad mainline to the practical capacity[16] of the line in 2008. Exhibit 3-10 shows the projected practical capacity for each line in 2028. The data for these maps were derived from the *Statewide Rail Capacity and System Needs Study*, the *2009 Marine Cargo Forecast Technical Report*, BNSF, and UP.

The two maps compare and contrast 20 years of demand growth with current capacity, identifying the gaps in capacity.

Stevens Pass

The Everett-Spokane line, which passes through the Cascade Tunnel at Stevens Pass, is the BNSF's major northern transcontinental route for double-stack intermodal container trains. It is heavily used, operated at about 70 percent of practical capacity in 2008.

Stampede Pass

The BNSF's Auburn-Pasco line, which passes through the Stampede Tunnel, operates today at a low level of practical capacity. The line cannot be used to relieve the Everett-Spokane line, because the ceiling of the Stampede Tunnel is too low to accommodate double-stack intermodal container trains. Grades over Stampede Pass also make it difficult to haul heavily-loaded unit grain trains along this line.

Columbia River Gorge

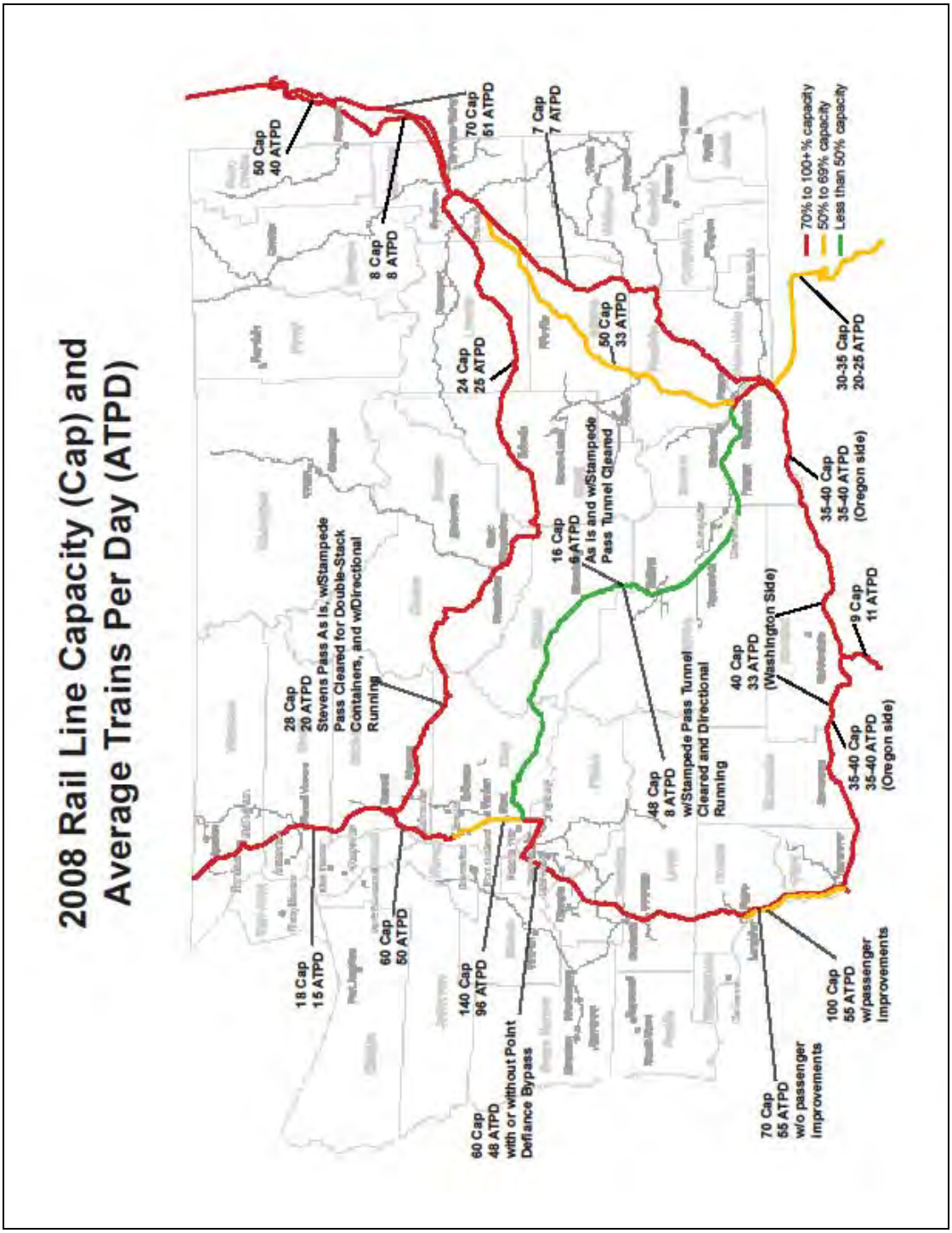
The BNSF's Vancouver-Pasco line, which follows the Columbia River along the north side of the Columbia River Gorge, is used by double-stack intermodal container trains moving east and grain trains moving west to the Puget Sound and Columbia River ports, and carload trains moving both east and west to serve state industrial and agricultural shippers. The line is operating today at about 80 percent of practical capacity.

Interstate 5 (I-5) Corridor

The I-5 corridor rail line runs the length of the state from the Canadian border, through Bellingham, Everett, Seattle, and Tacoma to Vancouver (WA) and Portland. It is the backbone of the state rail system, controlling access to the east-west lines. Most of the line is owned by the BNSF, but the BNSF shares operating rights over significant portions of the line with

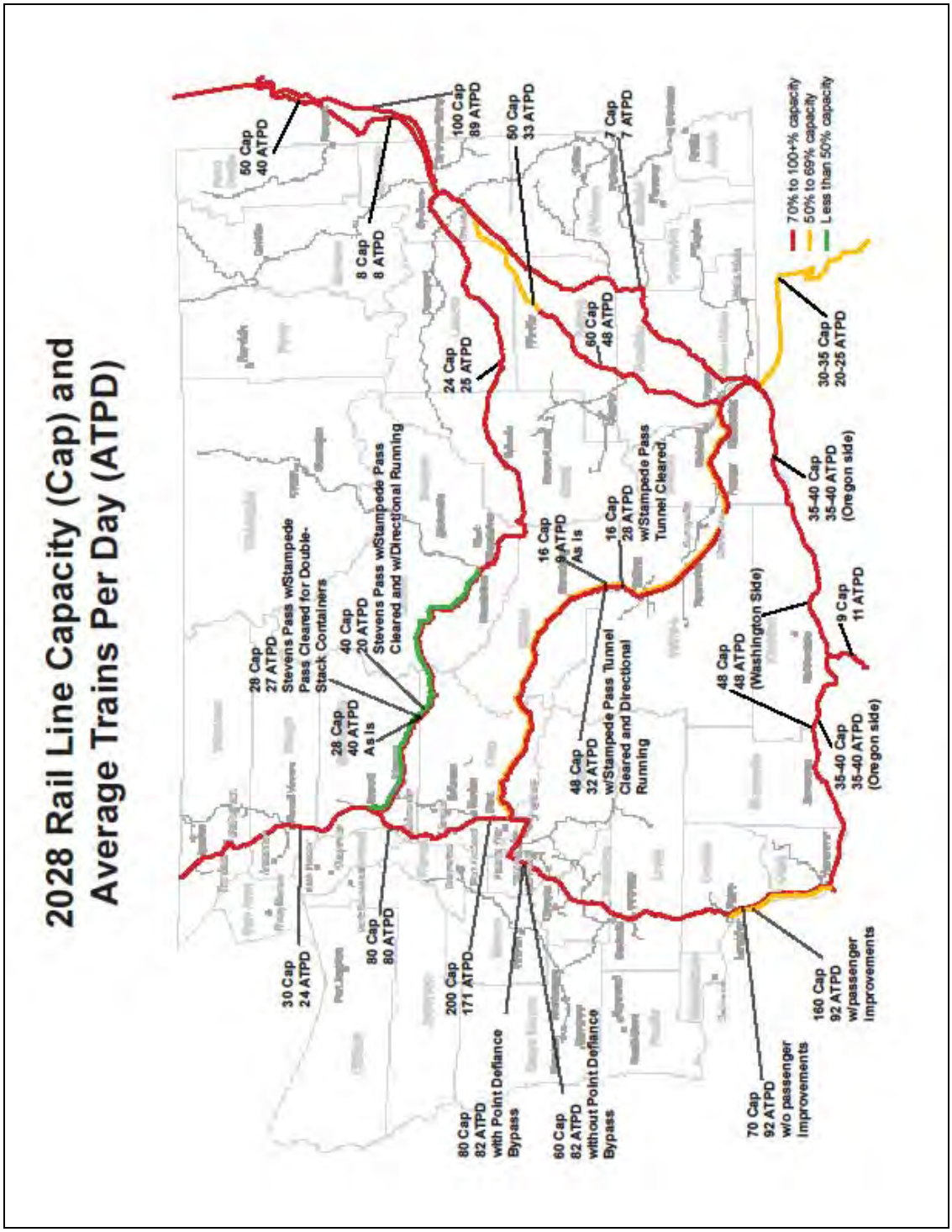
[16] Practical capacity is the highest activity level that a line can operate with an acceptable degree of efficiency, taking into consideration unavoidable losses of productivity.

Exhibit 3-9: 2008 Rail Line Capacity[17]



[17] Train volumes (average trains per day) reflect business activities that are fluctuated sharply and sensitive to economic climate. Although the long-term trend is upward, the short-term trend could drop significantly. The information in this map reflects the long-term forecast results. These numbers were derived based on the best knowledge of the researchers and information available at the time of the research. The recent recession impacts may not be captured by this map.

Exhibit 3-10: 2028 Rail Line Capacity



the UP, Amtrak's intercity rail services, and the *Sounder* commuter rail operations. The line operates at between 40 and 60 percent of practical capacity in most sections, but is subject to frequent stoppages when trains enter and exit the many ports, terminals, and industrial yards along the corridor. Some half dozen sections are chronic chokepoints, causing delays that ripple across the entire state and Pacific Northwest rail system.

Rail Bottlenecks

Exhibit 3-11 locates the major rail bottlenecks by type across the state rail system.

Exhibit 3-11: Railroad Bottlenecks

Bottleneck	Type of Bottleneck
Portland – Vancouver (WA)	Yard Infrastructure Main Line Infrastructure (Except Signal and Traffic Control) Geography, Geology, Topography, Regulation
Vancouver (WA)	Yard Infrastructure Main Line Infrastructure (Except Signal and Traffic Control) Passenger Operation
Ridgefield	Yard Infrastructure
Woodland – Castle Rock	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Passenger Operation
Vader – Chehalis	Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Passenger Operation Geography, Geology, Topography, Regulation
Chehalis	Yard Infrastructure
Centralia	Yard Infrastructure Signal and Traffic Control Systems Passenger Operation
Centennial	Passenger Operation
Nelson Bennett – Ruston	Main Line Infrastructure (Except Signal and Traffic Control)
Ruston – Reservation	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Infrastructure Condition
Reservation – Puyallup	Yard Infrastructure Signal and Traffic Control Systems
Auburn	Yard Infrastructure Infrastructure Condition
Tukwila – Argo	Main Line Infrastructure (Except Signal and Traffic Control)

Bottleneck	Type of Bottleneck
Argo – South Portal (Seattle)	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Geography, Geology, Topography, Regulation
Tacoma – Tukwila (UP)	Yard Infrastructure Main Line Infrastructure (Except Signal and Traffic Control) Infrastructure Condition Geography, Geology, Topography, Regulation
South Portal (Seattle) – MP 8 (Ballard)	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Passenger Operation Infrastructure Condition Geography, Geology, Topography, Regulation
MP 8 (Ballard) – Edmonds	Main Line Infrastructure (Except Signal and Traffic Control)
Edmonds	Main Line Infrastructure (Except Signal and Traffic Control) Passenger Operation Infrastructure Condition
Edmonds – Mukilteo	Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control)
Mukilteo	Main Line Infrastructure (Except Signal and Traffic Control) Passenger Operation Infrastructure Condition
Everett Jct. – PA Jct.	Main Line Infrastructure (Except Signal and Traffic Control) Infrastructure Condition
PA Jct. – Delta Jct.	Yard Infrastructure Signal and Traffic Control Systems Passenger Operation Infrastructure Condition Geography, Geology, Topography, Regulation
Marysville	Infrastructure Condition Geography, Geology, Topography, Regulation
English – Bow	Main Line Infrastructure (Except Signal and Traffic Control)
Bow – Swift	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Infrastructure Condition Geography, Geology, Topography, Regulation

Bottleneck	Type of Bottleneck
Swift – Thornton Yard (Surrey, BC)	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Infrastructure Condition Geography, Geology, Topography, Regulation
Vancouver (WA) – Wishram	Main Line Infrastructure (Except Signal and Traffic Control)
Wishram – Pasco	Main Line Infrastructure (Except Signal and Traffic Control) Geography, Geology, Topography, Regulation
Auburn – Ellensburg	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Infrastructure Condition Geography, Geology, Topography, Regulation
Ellensburg – Pasco	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Infrastructure Condition Geography, Geology, Topography, Regulation
Everett – Wenatchee	Yard Infrastructure Main Line Infrastructure (Except Signal and Traffic Control) Infrastructure Condition Geography, Geology, Topography, Regulation
Wenatchee – Spokane	Yard Infrastructure Main Line Infrastructure (Except Signal and Traffic Control) Infrastructure Condition Geography, Geology, Topography, Regulation
Pasco – Spokane	Yard Infrastructure Main Line Infrastructure (Except Signal and Traffic Control) Geography, Geology, Topography, Regulation
Spokane – Athol, ID (BNSF)	Main Line Infrastructure (Except Signal and Traffic Control)
Hinkle, OR – Spokane	Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Infrastructure Condition
Spokane – Eastport, ID	Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Infrastructure Condition
Vancouver (WA) (BNSF)	Yard Infrastructure Main Line Infrastructure (Except Signal and Traffic Control) Passenger Operation
Kalama (BNSF)	Yard Infrastructure

Bottleneck	Type of Bottleneck
Tacoma (BNSF)	Yard Infrastructure Main Line Infrastructure (Except Signal and Traffic Control)
Tacoma (Tacoma Rail)	Yard Infrastructure Main Line Infrastructure (Except Signal and Traffic Control)
Fife (UP)	Yard Infrastructure Main Line Infrastructure (Except Signal and Traffic Control)
Argo (UP)	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Geography, Geology, Topography, Regulation
Port of Seattle (BNSF & UP)	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Geography, Geology, Topography, Regulation
SIG/Stacy (BNSF)	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Geography, Geology, Topography, Regulation
Interbay (BNSF)	Yard Infrastructure Signal and Traffic Control Systems Main Line Infrastructure (Except Signal and Traffic Control) Passenger Operation Infrastructure Condition Geography, Geology, Topography, Regulation
Everett (BNSF)	Yard Infrastructure Signal and Traffic Control Systems Passenger Operation Infrastructure Condition Geography, Geology, Topography, Regulation
Wishram (BNSF)	Yard Infrastructure
Arco (Cherry Point; BNSF)	Yard Infrastructure
Longview Jct. (BNSF & UP)	Yard Infrastructure Signal and Traffic Control Systems
Pasco (BNSF)	Yard Infrastructure
Centralia (BNSF & UP)	Yard Infrastructure Signal and Traffic Control Systems Passenger Operation
Spokane (BNSF)	Yard Infrastructure

Source: Washington State Transportation Commission (WSTC) *Statewide Rail System and Capacity Study*, 2006

Rail Capacity

Exhibit 3-12 lists the rail segments where mainline practical capacity will be exceeded within 20 years, even with the additional capacity gained by operating longer trains and implementing better scheduling.[18] The existing bottlenecks will persist and worsen, some more quickly than others.

Nationally, rail capacity is not keeping pace with demand. The rail industry today is stable, productive, and competitive with enough business and profit to operate, but it is not yet attracting capital fast enough to replenish its infrastructure quickly or keep pace with demand and public expectations. This trend has been documented in several recent reports.[19]

Examples of capacity constraints:

Stevens Pass. With the Everett-Spokane line nearing its maximum capacity, the BNSF has been routing more intermodal trains south along the I-5 rail corridor to Vancouver (WA) and then east. This has added considerable volume to the Vancouver-Pasco line along the Columbia River Gorge, and made the scheduling of train moves through the Gorge and along the I-5 rail corridor more complex.

I-5 Corridor. The on-time performance of the Amtrak *Cascades* service has dropped, and delays for both BNSF and UP freight trains have increased, although recent changes in freight operating practices have improved performance somewhat. The problem is particularly acute in the Portland/Vancouver (WA) area, where the railroads' north-south and east-west routes intersect. Rail simulation studies (i.e. grain trains bound for the ports, intermodal trains running through, industrial carload trains serving local industries, and intercity passenger trains shuttling up and down the I-5 corridor) show that the delay hours per train moving through the Portland/Vancouver area are greater than the delay hours for trains in the Chicago area, one of the nation's most congested rail hubs.[20] Railroading is one of the most capital intensive industries in the U.S., and investment in fixed assets can be a risky proposition.

[18] Demand is total demand not just traffic of the owner.

[19] See for example: American Association of State Highway and Transportation Officials, *Freight-Rail Bottom Line Report*, Washington, D.C., 2003; and United States Government Accountability Office, *Freight Railroads: Industry Health Has Improved, But Concerns About Competition and Capacity Should Be Addressed*, Washington, D.C., October 2006.

[20] "Freight, Intercity Passenger and Commuter Rail," PowerPoint presentation to the Portland-Vancouver I-5 Transportation and Trade Partnership on May 21, 2002; and "Final Strategic Plan: June 2002," prepared by Willard F. Keeney and HDR, Inc. for the Portland-Vancouver I-5 Transportation and Trade Partnership.

Exhibit 3-12: Rail Lines in Washington State Exceeding Practical Capacity 2008 and 2028

(Based on Peak Day Train Volumes and Assuming Operation of 8,000-Foot Trains)

Rail Segment	RR	2008 Capacity	2008 Demand	2008 Utilization as % of Capacity	2028 Capacity	2028 Demand	2028 Utilization as % of Capacity
Everett to Seattle	BNSF	60	48	80%	80	80	100%
Seattle to Tacoma	BNSF	140	80	57%	200	171	86%
Tacoma to Kalama/Longview w/Point Defiance Bypass	BNSF	60	62	103%	80	82	103%
Tacoma to Kalama/Longview w/o Point Defiance Bypass	BNSF	60	62	103%	60	82	137%
Kalama/Longview to Vancouver, WA w/Passenger Improvements	BNSF	100	55	55%	160	92	58%
Kalama/Longview to Vancouver, WA w/o Passenger Improvements	BNSF	70	55	79%	70	92	131%
Everett to Wenatchee, as is	BNSF	28	16	57%	28	40	143%
Everett to Wenatchee Stevens Pass as is, w/Stampede Pass cleared for double-stack countainers	BNSF	28	16	57%	28	26	93%
Everett to Wenatchee Stevens Pass as is, w/Stampede Pass cleared for double-stack countainers, and w/directional running	BNSF	28	16	57%	40	20	50%
Wenatchee to Spokane	BNSF	24	18	75%	24	25	104%
Auburn to Pasco, as is	BNSF	16	6	38%	16	9	56%
Auburn to Pasco w/o Stampede Pass Tunnel Cleared	BNSF	16	6	38%	16	28	175%
Auburn to Pasco w/Stampede Pass Tunnel Cleared and directional running	BNSF	48	8	17%	48	32	67%
Vancouver, WA to Pasco	BNSF	40	32	80%	48	48	100%
Vancouver, WA to Pasco	UP	40	40	100%	40	40	100%
Pasco to Spokane	BNSF	50	32	64%	60	48	80%
Pasco to Spokane	UP	7	7	100%	7	7	100%
Spokane to Sandpoint, ID	BNSF	70	45	64%	100	89	89%
Spokane to Sandpoint, ID	UP	8	7	88%	8	8	100%

Blue shows lines that are at or are projected to be at 100 percent or more of capacity by 2028.

Source: 2009 Marine Cargo Forecast

During the 1990s, when railroads found themselves with excess capacity and profits were down, Wall Street downgraded bond ratings and railroad stock prices fell. In the last several years, this trend has reversed and Class I railroads are reinvesting heavily to maintain and add capacity to their systems. However, much of this investment is replacing existing infrastructure and maintaining existing capacity, because rail traffic places

enormous wear and tear on rails, bridges, tunnels, and locomotives. To reduce longer-term financial risk, both the BNSF and the UP have investment strategies that emphasize increasing capacity through operations first and infrastructure expansion last.

To manage demand while new capacity is being added, the railroads are using pricing to turn aside lower-profit carload freight in favor of intermodal and coal traffic, which can be handled more cost-effectively and profitably in unit or destination-specific trains. In some markets and corridors, international intermodal traffic is squeezing out industrial and low-density agricultural carload traffic. Shippers, who are used to being price setters, are now price takers.

Furthermore, the national capacity crunch is focusing more rail traffic and railroad investment on the Pacific Southwest at the expense of the Pacific Northwest and the state. Continuing high levels of growth and the competition between BNSF and UP for the lucrative southern California rail market have made southern California the key focal point of investment for both railroads.

Capacity shortfalls will complicate the improvement of intercity passenger rail service. As a condition of the deregulation of the railroad industry in 1980, federal law requires that freight railroads share the use of their lines with intercity passenger rail providers and give passenger trains priority over freight trains. But the differing needs of the passenger and freight railroad create tension between the needs of the passenger rail operators and the needs of freight rail operators as each tries to maximize the performance of their respective operations.

In general, frequent passenger rail service, especially frequent high-speed rail service, requires relatively wide time-space slots on the mainline to ensure that the passenger trains do not overtake slower-moving carload freight trains.[21]

Recent Major Policy Changes Impacting the Rail System in Washington State

Safety Regulation

The state has very little safety jurisdiction over rail operations, except for public highway-rail crossings. States can conduct inspections in various

[21] Intermodal trains are also significant consumers of rail capacity, because they are long, move at speeds similar to passenger trains, and require priority of movement. The railroads market these trains as premium services, and they generate substantial revenue for the railroads.

safety disciplines as part of a state-federal participation program, but any enforcement is done by the Federal Railroad Administration (FRA) in the areas of hazardous materials, track, signals, and operating practices.

Appendix 3-B discusses rail safety regulation, including rail employee safety, remote control operations, community notice, blocked crossings, train speeds, grade crossing protective zones, housekeeping, quiet zones, crossing consolidation/closure, and Operation Lifesaver—an international organization promoting rail safety and awareness.

Positive Train Control[22]

Positive Train Control (PTC) refers to technology that is capable of preventing train-to-train collisions, over-speed derailments, and casualties or injuries to roadway workers. PTC systems vary widely in complexity and sophistication based on their level of automation, functionality, system architecture (i.e., non-signaled, block signal, cab signal), and degree of control.

Prior to October 2008, PTC systems were being voluntarily installed by various carriers. However, the Rail Safety Improvement Act of 2008 (RSIA), signed by the President Bush on October 16, 2008 as Public Law 110-432, has mandated the widespread installation of PTC systems by December 2015.

Currently, all of the affected railroads are aggressively developing PTC implementation plans as required by the RSIA and adapting their PTC systems to maximize interoperability.[23] The FRA is supporting all rail carriers that have statutory reporting and installation requirements to install PTC, as well as rail carriers that are continuing to voluntarily implement PTC through a combination of regulatory reform, project safety oversight, technology development, and financial assistance.

On March 7, 2005, FRA published regulations regarding performance standards for processor-based signal and train control systems per Title 49 Code of Federal Regulations Part 236, Subpart H. A working group of the Railroad Safety Advisory Committee first developed these performance-based regulations versus traditionally prescriptive regulations. The new performance-based regulations require that a railroad demonstrate with a high degree of confidence, that the risks associated with a new product

[22] http://www.fra.dot.gov/us/content/1265.

[23] The BNSF, UP, Norfolk Southern Railway, and CSX Transportation are leading the interoperability effort for technologies based on the Electronic Train Management System for rail traffic outside of the Northeast Corridor. The National Passenger Rail Corporation (Amtrak) is undertaking similar action for rail traffic in the NEC using the Advanced Civil Speed Enforcement System.

being implemented are less than or equal to the risks associated with the product that is being replaced.

After extensive participation and contributions by railroads, rail labor, suppliers, and other agencies, including the National Transportation Safety Board, the performance-based regulations became effective on June 6, 2005. The Subpart H regulations support the voluntary introduction of innovative technology, including systems using computers and radio data links, to accomplish PTC functions. In addition to supporting advancement of PTC systems, these regulations also facilitate the ever-growing use of processor-based equipment and functioning in otherwise conventional signal and train control systems.

FRA is working to develop a new performance-based regulation to address the various statutory requirements of RSIA and to better support railroads that must install PTC systems. This new regulation is being crafted to ensure system safety while reducing the administrative overhead.

There are currently 11 different PTC pilot projects in varying stages of development and implementation, involving nine different railroads in at least 16 different states, and consisting of over 4,000 track miles. These pilot projects are not only allowing railroads to continue to advance the various technologies used to implement PTC systems, but are providing the railroads valuable experience on installation and test procedures required to meet the 2015 deployment completion date.

Washington State Department of Transportation

Chapter 4: Freight Rail Services – Effects on the Economy and Society

Functions of Freight in Washington's Economy

Washington State's (state) multimodal transportation system supports economic vitality and quality of life in the state and region. The smooth functioning of highways, railways, ports, pipelines, and airports allows businesses and consumers to trade and purchase the goods necessary to sustain business and daily life. With coordinated planning and strategic investments, the state and its partners can provide a transportation system that meets the challenges and opportunities ahead. Including statewide freight rail into statewide transportation planning and investment decisions is increasingly important.

The three components of the state's freight activities are:

Made in Washington – Regional Economies Rely on the Freight System

The state's manufacturers and farmers rely on the freight system to ship Washington-made products to local customers, big United States (U.S.) markets in California and on the east coast, and worldwide. The state's producers generate wealth and jobs in every region in the state.

Delivering Goods to You – The Retail and Wholesale Distribution System

The state's distribution system is a fundamental local utility; without it state residents would have no food to eat, clothes to wear, books to read, spare parts, fuel for their cars, or heat for their homes. In other words, the economy of the region would no longer function. The value and volume of goods moving in these freight systems is huge and growing.

Global Gateways – International and National Trade Flows Through Washington

This is a gateway state, connecting Asian trade flows to the U.S. economy, Alaska to the Lower 48, and Canada to the U.S. West Coast. About 70 percent of international goods entering the state's gateways continue on to the larger U.S. market. Thirty percent become part of the state's manufactured output or are distributed in the state's retail system (Exhibit 4-1).

Exhibit 4-1: Washington State Is a Global Gateway



Source: Washington State Department of Transportation (WSDOT) Geographic Services and Strategic Analysis and Program Development, 2004

These components underpin our national and state economies, support national defense, directly sustain hundreds of thousands of jobs, and distribute the necessities of life to every resident of the state every day.

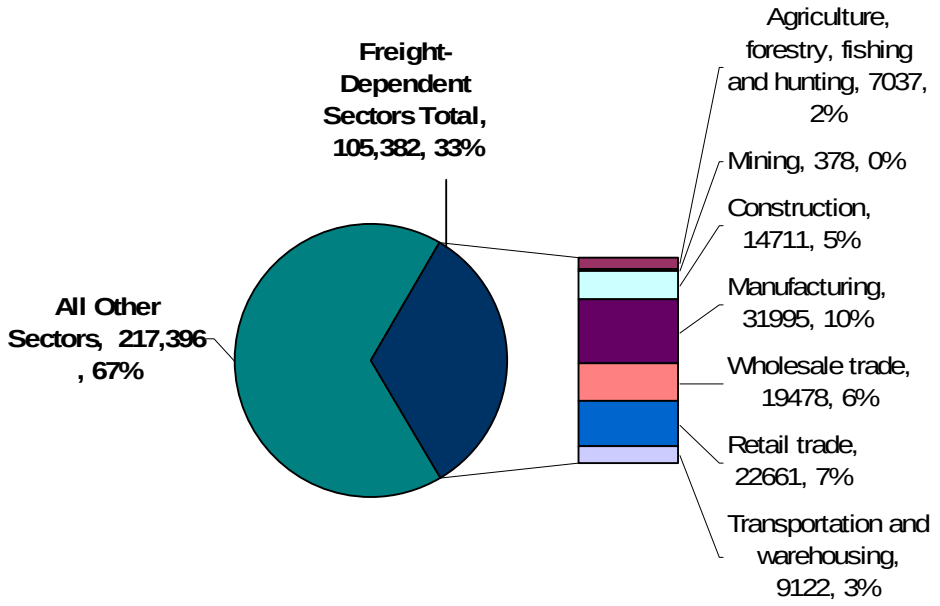
A large part of the state's economy depends on freight for its competitiveness and growth. The most highly freight-dependent sectors include agriculture, mining, construction, manufacturing, wholesale, retail, transportation, and warehousing. In 2008 freight-dependent sectors accounted for 33 percent of the state's Gross Domestic Product (GDP), 71 percent of business income, and 39 percent of state employment (Exhibits 4-2, 4-3, and 4-4).

Freight Rail in Washington's Economy

Rail provides critical transportation for manufacturers, agricultural producers, lumber and wood product producers, the food products industry, and the ports and international trade sector—all important sectors of the state economy. Freight rail, in terms of tonnage, accounted for 19 percent of total freight in the state in 2007.

Exhibit 4-2: Freight-Dependent Sectors GDP
Washington State 2008 ($ Millions)

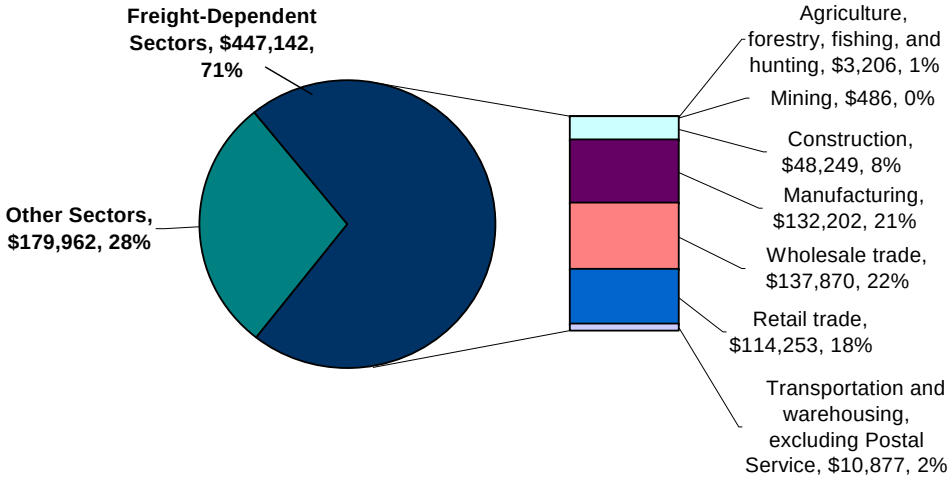
Freight-Dependent Sectors: $105,382
All Sectors: $217,396



Source: U.S. Department of Commerce (USDOC), Bureau of Economic Analysis, compiled by WSDOT State Rail and Marine Office

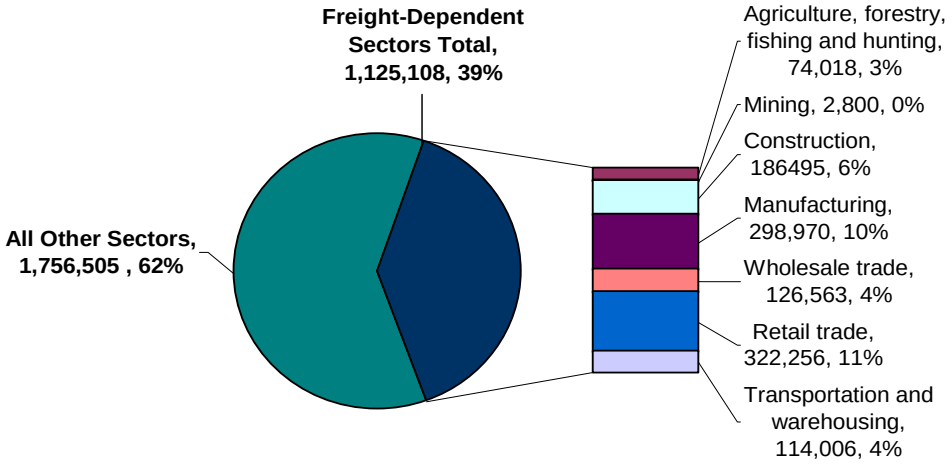
Exhibit 4-3: Business Incomes of Freight-Dependent Sectors
Washington State 2008 ($ Millions)

Freight-Dependent Sectors: $447,142
All Sectors: $627,104



Source: Washington State Department of Revenue, compiled by WSDOT State Rail and Marine Office

Exhibit 4-4: Freight-Dependent Sectors Employment
Washington State 2008 First Quarter
Freight-Dependent Sectors: 1.125 Millions Jobs
All Sectors: 2.881 Millions Jobs

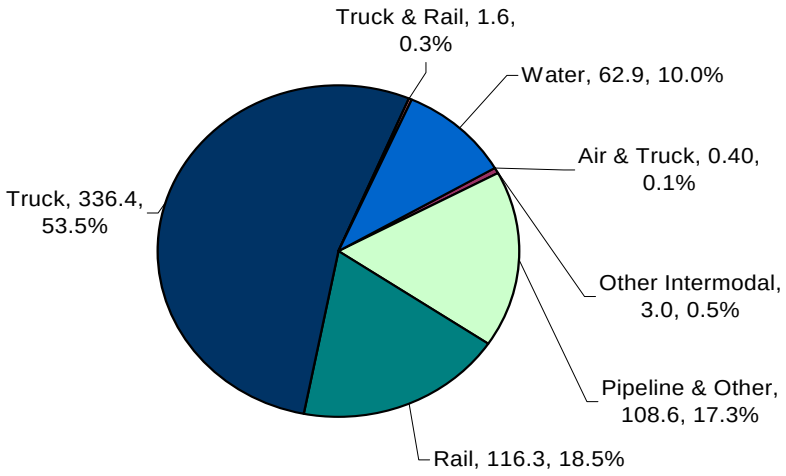


Source: Washington State Employment Security Department 2008, compiled by WSDOT State Rail and Marine Office

Freight Rail Flows

Freight rail provides shippers with cost-effective transportation, especially for heavy and bulky commodities, and can be a critical factor in retaining and attracting industries that are central to state and regional economies (Exhibit 4-5).

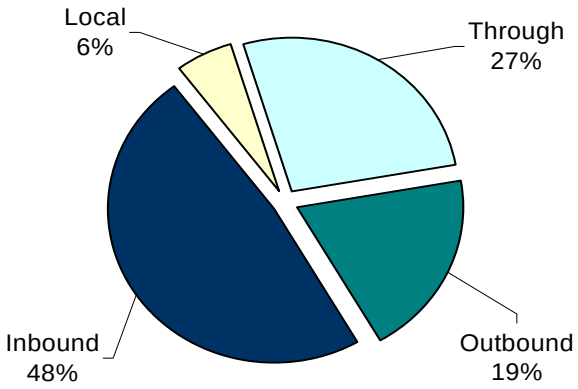
Exhibit 4-5: Freight by Mode – Washington State 2007
(Million Tons)



Source: WSDOT State Rail and Marine Office – Analysis based on Federal Highway Administration (FHWA) Freight Analysis Framework (FAF) Data and 2007 Surface Transportation Board (STB) Waybill Data

In 2007 the state's freight railroads moved more than 116 million tons of freight, an almost 40 percent increase from 83 million tons in 1996. Cargo moving on rail inbound was 48 percent—originating from other states or Canada and terminating in the state. The second largest flow type at 27 percent was cargo moving through the state without loading or unloading. Local cargo, which originated and terminated within the state, comprised six percent of the total rail cargo. Outbound cargo—originating in the state and terminating in another state or Canada—was 19 percent of total state rail freight (Exhibit 4-6).

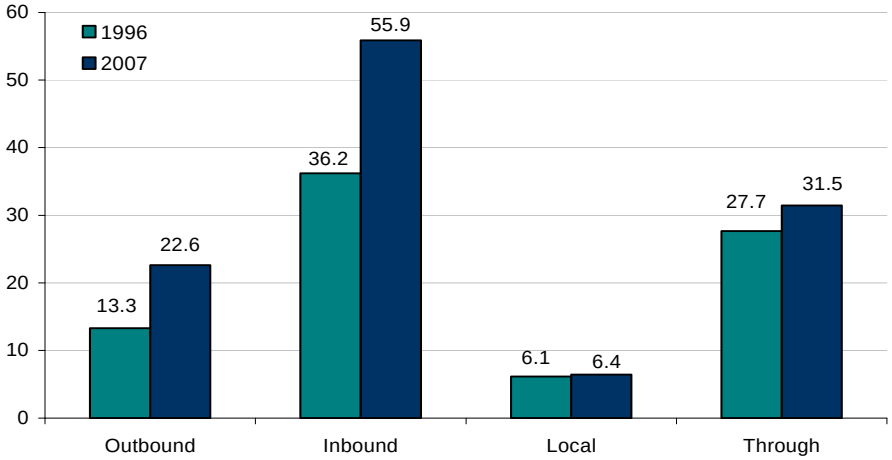
Exhibit 4-6: Rail Freight Flows – Washington State 2007[1]



Source: WSDOT State Rail and Marine Office – 2007 Surface Transportation Board Waybill Analysis

The largest increase in percentage terms is outbound with a 70 percent increase, followed by inbound with a 54 percent increase (Exhibit 4-7).

Exhibit 4-7: Growth of Rail Freight Flows
Washington State 2007 versus 1996 (Million Tons)

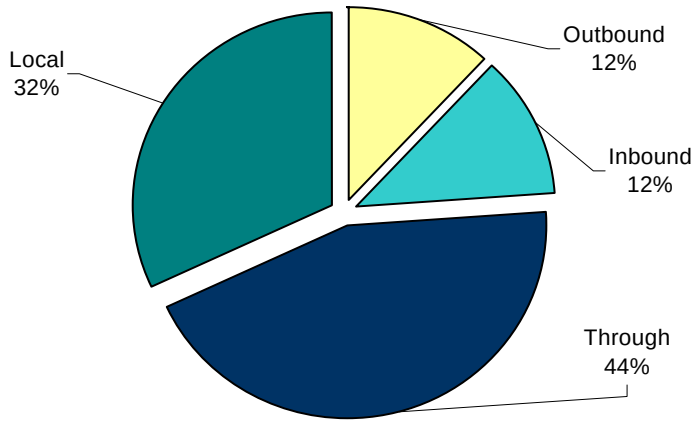


Source: WSDOT State Rail and Marine Office – 2007 Surface Transportation Board Waybill Analysis

[1] Federal Waybill data is available for 2007. 2008 data is not available until early 2010.

As can be seen by comparing Exhibit 4-6 and Exhibit 4-8, the state is much more dependent on inbound cargo than the average state, which has only 12 percent inbound cargo that is moved by rail. In other states approximately one third of the freight rail traffic is local. Local moves by rail in this state are only 6 percent of the total rail freight. The state is truly a Global Gateway for the U.S. Due to this being a coastal state, its through traffic of 31.5 million tons (27 percent) is considerably below the average of all states' through traffic of 44 percent.

Exhibit 4-8: Directional Rail Freight Flows
Average of Other States in U.S. 2007



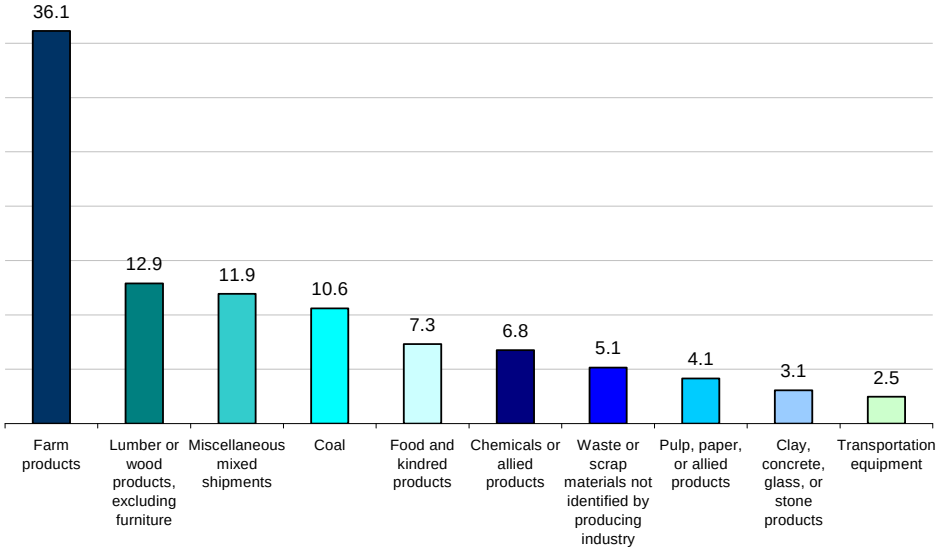
Source: WSDOT State Rail and Marine Office – 2007 Surface Transportation Board Waybill Analysis

Major Commodities Shipped by Rail

The economic vitality of the state requires a robust rail system capable of providing its industries, ports, and farms with competitive access to North American and overseas international markets. The state is well known for its agricultural products such as apples, wheat, soft fruits, and many other agricultural products. Freight rail plays an important role in the state's agriculture sector. Lumber and wood product producers, manufacturers, waste management, and mining also rely on rail transportation to move heavy, bulky products to markets cost-effectively.

Farm products, primarily wheat and grain (36.1 million tons), were the largest commodity moved on our rail system in 2007, followed by lumber and wood (12.9 million tons), miscellaneous mixed shipments (11.9 million tons), and coal (10.6 million tons). In 2007, 100.4 tons (almost 86 percent) of freight moved on state rail was from the top ten commodities (Exhibit 4-9).

Exhibit 4-9: Top 10 Commodities Shipped by Rail
Washington State 2007 (Million Tons)



Source: WSDOT State Rail and Marine Office – 2007 Surface Transportation Board Waybill Analysis

Trade Partners

The state's rail freight supports regional, national, and international trade and economies. In 2007 more than 55 million tons of goods arrived in the state from 42 other states and Canada by rail for export and in-state consumption. Meanwhile, 23 million tons of goods were exported from the state to 45 other states and Canada by rail. Exhibits 4-10 and 4-11 provide details of inbound and outbound flows that reflect the state's trades with its partners.

The state itself plays an important role in support of trade and economy. One example is the Produce Rail Car program operated by WSDOT with leveraged federal grant funds. This program maintains economic viability in farming areas of the eastern side of the state by supporting produce exports through a lower shipping cost. Exhibit 4-12 shows the estimated 2008 economic impacts of this program.

If rail service deteriorates, these businesses may shift their freight to trucks, but this could increase their transportation costs and may increase the road maintenance costs for state and local governments. In some cases, the loss of rail service could drive businesses to relocate or close. Rail service deterioration would also contribute to more congestion, higher green house gas emissions, higher energy use, and a negative impact on safety.

Exhibit 4-10: Inbound Rail Freight Flows

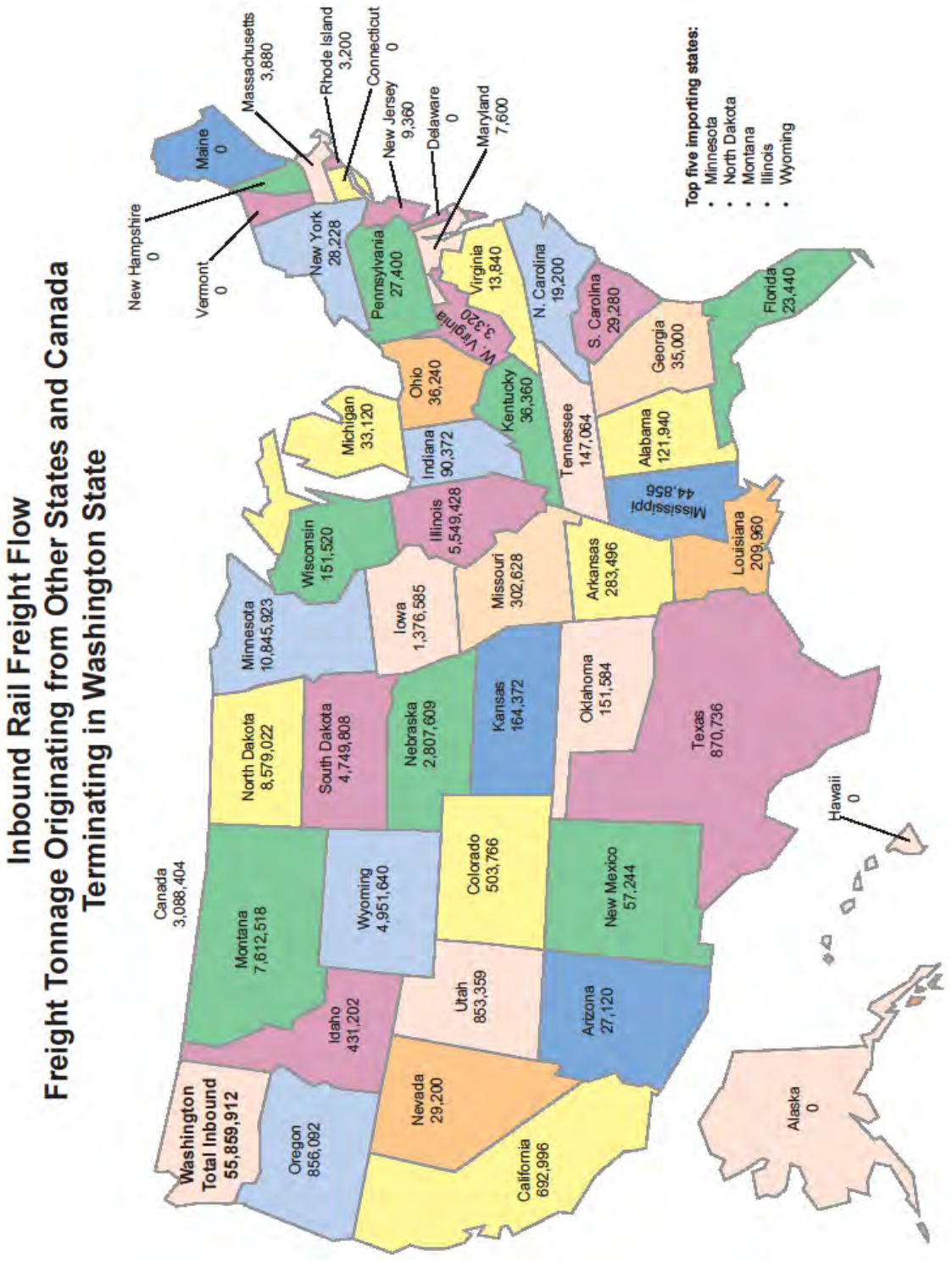


Exhibit 4-11: Outbound Rail Freight Flows

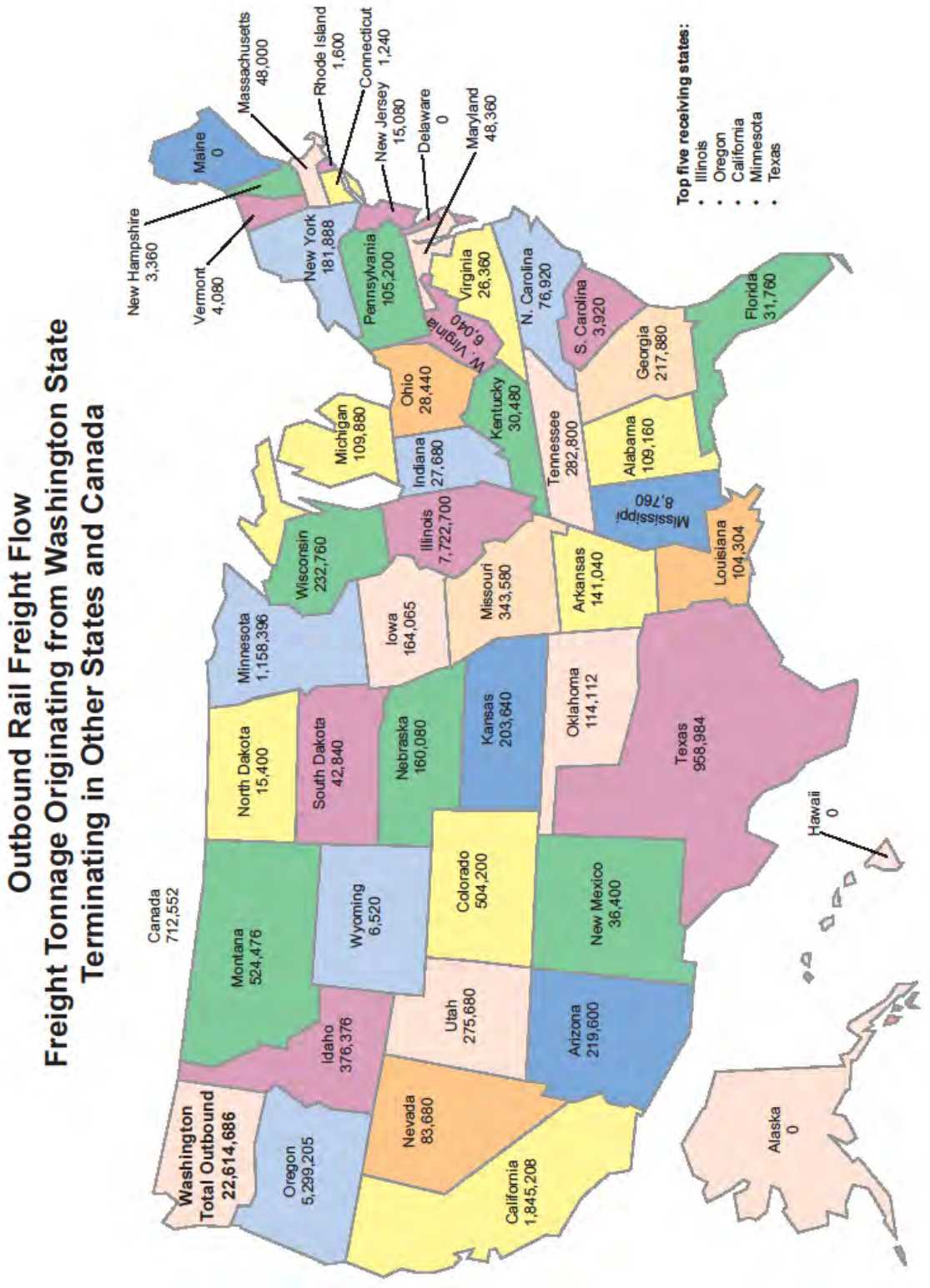


Exhibit 4-12: Economic Output and Employment Supported by Produce Rail Car Program* – Year 2008

Impacts**	Direct	Indirect	Induced	Total
Economic Output ($ Million)	$30	$17	$18	$66
Employment (Jobs)	409	133	151	693
Value Added* ($ Million)**	$13	$8	$11	$32

Source: WSDOT State Rail and Marine Office - IMPLAN Input-Output model for Washington State and its local areas.

* Economic impacts are assessed using the IMPLAN Input-Output model for Washington State and its local areas. Using classic input-output analysis in combination with regional specific Social Accounting Matrices and Multiplier Models, IMPLAN provides a highly accurate and adaptable model for its users. The IMPLAN database contains county, state, zip code, and federal economic statistics which are specialized by region, not estimated from national averages, and can be used to measure the effect on a regional or local economy of a given change or event in the economy's activity.

** Direct impact is measured as the jobs, outputs, and value added within farming industries and shippers supported by the produce rail car program. Indirect impact is measured as the jobs, outputs, and value added occurring within other industries that provide goods and services to the directly affected industries. Induced impact is the change in jobs, outputs, and value added resulting from household spending of income earned either directly or indirectly from the shippers industry's spending.

*** Difference between the total sales revenue of an industry and the total cost of components, materials, and services purchased from other firms within a reporting period (usually one year). It is the industry's contribution to the GDP.

The following section discusses rail-intensive industries in the state and their impacts on the state's economy and dependence on freight rail.

Rail Intensive Sectors and Industries in Washington State

Agriculture and Food Products Industry/Bulk and Specialized Carload Shippers[2]

Agriculture and food product manufacturers are important economic sectors in the state, generating 2.9 percent of the gross state product[3] and accounting for 4.1 percent of 2008 employment.[4] The state agricultural and food manufacturing production was valued at over $13.6 billion in

[2] The section is adopted from the Washington State Transportation Commission's (WSTC) *Statewide Rail Capacity and System Needs Study* (2006).
[3] USDOC Bureau of Economic Analysis.
[4] Employment Security Department.

2008.[5] Agriculture is the primary source of employment in many of the state's rural counties.

Agricultural rail traffic outbound from the state is expected to grow at a compound annual growth rate of 3.3 percent over the next 20 years. The state also has an expanding food products industry with particular strengths in frozen foods (7.3 percent of U.S. output) and wine production.[6]

However, most of the agricultural tonnage moving on the state rail system is midwestern grain moving to the Lower Columbia River and Puget Sound ports for export. And because midwestern grain is moving long distances by unit train, it is generally more attractive for the railroads than local state agricultural shipments, which must move shorter distances for export and may require specialized handling.

The Class I railroads are asking state agricultural shippers to consolidate their shipments at new facilities, and this may be economical for those shippers who can accommodate the changes. However, these changes can also lead to un-served and underserved markets where shippers have difficulty finding efficient transportation. These changes could affect the short lines, which may see declines in their markets; operators of small grain elevators along the short lines who also stand to lose business; and the remaining shippers on the short lines who could see reductions in service and increased costs. The challenge faced by state agriculture is to maintain competitive rail service as it focuses on higher-value added crops and produce that may not generate the volumes that are attractive to the Class I railroads. This need to consolidate carloads for more efficient rail service is a prime situation where state funding could make sense. This has been done very successfully in Oregon.

Ports and International Trade Sector/Intermodal Container Shippers[7]

The state's ports and international trade industry depend on rail to export grain and other agricultural products, and to import intermodal containers of consumer goods. Although in 2007 rail only accounts for 19 percent of total freight in the state in terms of tonnage, it accounts for 42 percent of marine cargo.[8] If the rail system cannot deliver high-quality transportation services, especially for intermodal cargo that is not destined

[5] Department of Revenue.
[6] WSTC – *Statewide Rail Capacity and System Needs Study* (2006).
[7] The section is developed based on 2006 WSTC *Statewide Rail Capacity and System Needs Study* and WSDOT/Washington Public Ports Association (WPPA) *2009 Marine Cargo Forecast.*
[8] WSDOT/WPPA *2009 Marine Cargo Forecast*, STB Waybill data 2007, and United States Department of Transportation (USDOT) FAF 2008.

for this state, shippers may shift to other ports. This could affect port-supported economic sectors. In addition, export trade plays a major role in the state economy. Rail frequency and quality affects the frequency and array of service offered by shipping lines. Without good rail connections to support both import and export trade, state ports would become less attractive to ocean carriers, and ultimately, the state would become a less attractive location for export businesses.

About 40 percent of the state's rail traffic is related to port activity. The amount moving to state ports by rail is forecast to increase from the current 42 million tons to 66 million tons in 2030.[9] The state's ability to meet this opportunity will depend on the investments made to expand and improve rail operations and infrastructure.

International trade generates large flows of intermodal containers through the Ports of Seattle and Tacoma. Between 1999 and 2008, container traffic grew at an average annual rate of 2.9 percent from 2.76 million Twenty-Foot Equivalent Units[10] (TEUs) to 3.57 million TEUs at Puget Sound ports.[11] Much of the container traffic consists of merchandise and retail goods imported from Asia through the ports, and then transferred to rail for shipment to Midwestern and eastern U.S. markets. Businesses and consumers across the U.S. benefit from this international trade, but healthy deepwater ports also provide benefits to the state.

The state is among the top export states due to the strong market for Boeing aircraft. While many state exporters do not use the rail system to deliver goods to state ports, the existence of a healthy rail system is important, because it brings more traffic to the ports and more shipping services that can be used by state exporters. Strong long-haul rail services allow ocean carriers to access larger and more distant inland markets. Local export shipments help to balance import and export flows for the carrier. Thus, a strong rail system helps attract ocean carrier services to state ports and makes the state a more attractive location for national, regional, and local export businesses.

Manufacturers/Industrial Carload Shippers[12]

Manufacturing and industrial product industries are among the largest rail-using state businesses, and they primarily use rail carload services. Shippers include producers of metals, machinery, transportation equipment (including aircraft), wood and paper, petroleum, and plastic

[9] WSDOT/WPPA *2009 Marine Cargo Forecast.*
[10] Twenty-Foot-Equivalent Unit. The 8-foot by 8-foot by 20-foot intermodal container is used as a basic measure in many statistics.
[11] Port of Seattle and Port of Tacoma.
[12] The section is adopted from *Statewide Rail Capacity and System Needs Study*.

products. In 2008 the largest tonnage volumes of outbound shipments from these industries were waste and scrap materials; pulp, paper, and allied products; transportation equipment; primary metal products; and chemicals and allied products.[13] Inbound manufactured or industrial products included coal; chemicals; clay, concrete, glass, and stone; pulp and paper; and primary metal products.[14]

The volume of shipments of manufacturing goods is expected to grow steadily. However, many of the shippers reported that they were paying higher prices, were getting lower quality service, and were often having business turned away by the railroads.[15] These shippers will substitute truck for rail when they can, but for shippers of bulky, semi-finished products, or primary materials, trucking may not be feasible or cost effective. Hence, there is a risk that the state will lose some of the businesses, such as coal and gravel that depend on carload shipments, to relocation or closure.

A key feature of rail is the ability to move heavy and high/wide manufacturing products that cannot be moved via truck.

Economic Impacts of Freight Rail

Freight rail has significant economic impacts. In 2007 total state rail freight revenue, including rail-only and rail intermodal, amounted to $2 billion. Freight rail employed 4,207 people in the state and contributed $533 million to the state's GDP directly. The state's freight rail system also supports other economic sectors. Exhibit 4-13 provides an overview of the economic impacts of freight rail in the state.

Major Drivers in Freight Rail Demand

There are four major drivers that determine freight demand:

- Population size and trends; demographic changes.
- Economic activity, both domestic and international.
- Trade activity, both domestic and international.
- Supply chain practices.

[13] Goods shipped from this state to other states and countries by rail.
[14] Goods shipped from other states and countries to this state by rail. Do not confuse this with state import.
[15] Shippers' survey conducted by researchers of *2006 Statewide Rail Capacity and System Needs Study*.

Exhibit 4-13: Economic Impacts of Freight Rail Transportation – Washington State 2007

Impact Category	Direct*	Indirect**	Total
Employment (Jobs)	4,207	6,057	10,264
Business Revenue ($ Million) ***	$1,154	$884	$2,038
Employee Compensation ($ Million)	$417	$259	$676
GDP ($ Million) ****	$533	$383	$916
Tax Impact ($ Million)	N/A	N/A	$271

* Directly related to freight rail transportation industry.

** Jobs that support freight rail transportation but not hired by rail transportation industry.

*** Business revenue of an industry is total sales of all business in the industry.

**** GDP is value-added or the difference between the value of its output and the value of its input. GDP of an industry is measured as sum of values added by all businesses in the industry. It is sales of goods minus purchase of intermediate goods to produce the goods sold.

Sources: Association of American Railroads, WSDOT State Rail and Marine Office - IMPLAN Input-Output model for Washington State and its local areas.

Population Growth and Trade Growth

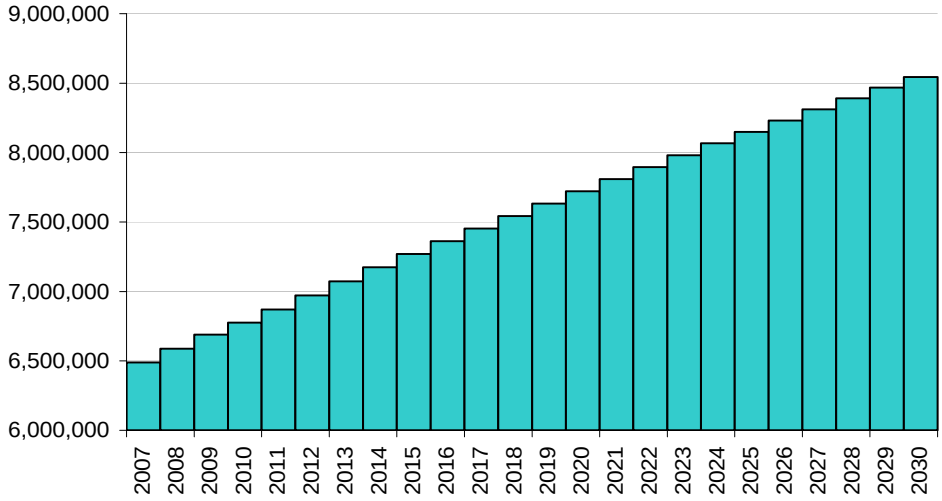
As Exhibit 4-14 shows, the population of the state is projected to grow at 1.2 percent a year. However, freight rail demand in the state is tied both to U.S. population growth and to state population growth, due to the fact that the state is one of the major global gateway states and plays an important role in the national economy and international trade. Therefore, freight rail demand grows faster in Washington State than the national average.

It is estimated that one in four jobs in the state is trade related.[16] Thus, for the import side of the equation, it is the growth in the total U.S. population and their consumption that drives the demand for freight rail in this state. On the export side of the equation, the demand is built on world population growth of developing countries in Asia and their need to feed their people. U.S. imports grew at an annual pace of 8.8 percent between

[16] www.washingtonports.org and www.portjobs.org/.

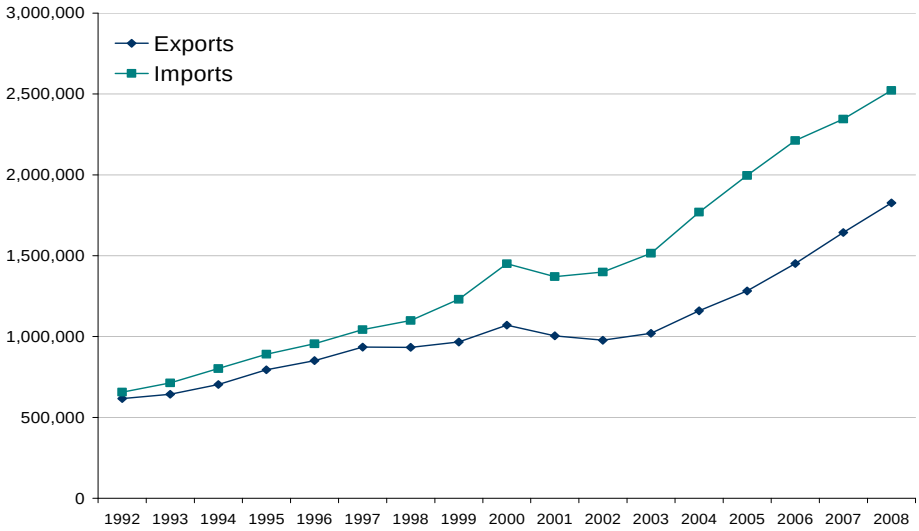
1992 and 2008, and U.S. exports grew at 7.0 percent during the same period (Exhibit 4-15).

Exhibit 4-14: Population Growth – Washington State 2007-2030



Source: Washington State Office of Financial Management

Exhibit 4-15: U.S. Export and Import, 1992 to 2008
($ Million)



Source: U.S. Census Bureau, Foreign Trade Division

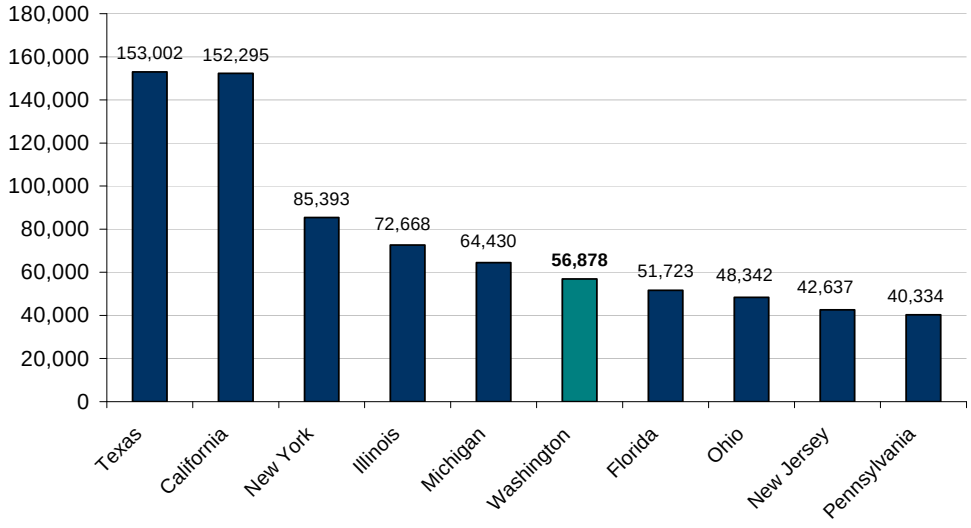
Most trade forecasters agree that the degree of foreign trade dependency on the world's major economies will continue to grow. That is the U.S. and its major trading partners will continue to become more "open" economies. This trend will continue because the developing world continues to offer increasingly advantageous locations for production. Economic efficiency is the driver for economic globalization. As a consequence, the ability to produce lower cost goods and services in

different locations leads to more trade and transportation. While the past growth rate is not expected to be sustainable, it is believed the trend of imports and exports is likely to continue to grow at a slow but steady pace.

The state, as a major global gateway state, shared a significant portion of such growth in 2008, ranking sixth in exports (Exhibit 4-16).

Imports drive the demand for rail service in the state as the fast growth of international container traffic through state gateways to U.S. markets continues. However, the trend has been slowing lately and future growth is likely to continue at a slower pace (Exhibit 4-17).

Exhibit 4-16: Top Ten Export States in the United States – 2008
($ Millions)

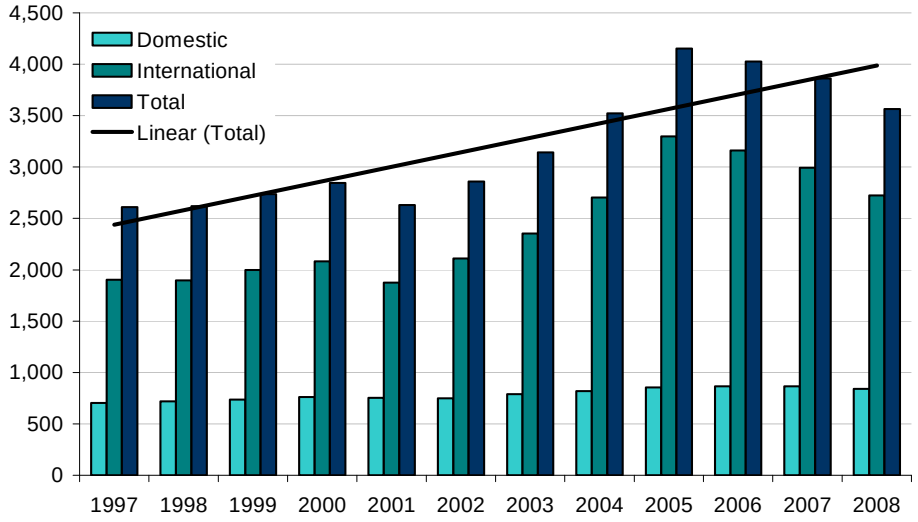


Source: U.S. Census

Economic Growth

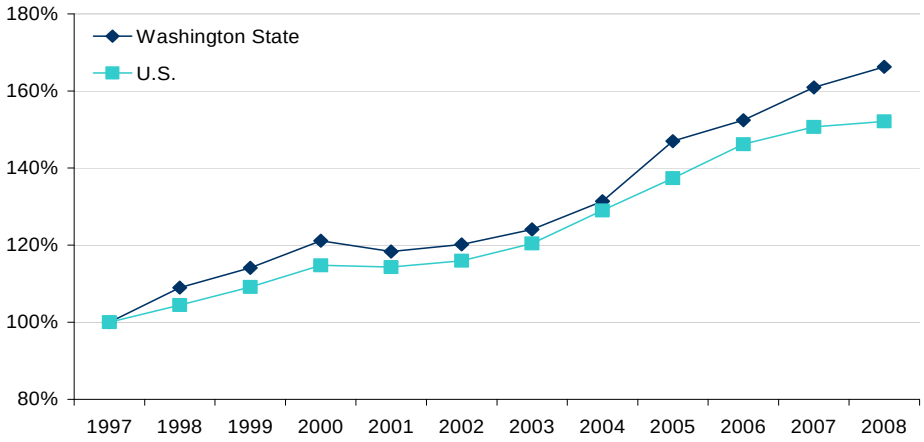
The economic growth of many sectors of the state economy is dependent on freight. Most of these freight-dependent sectors at some point depend on the rail system within the state to move their goods. The growth of freight dependent sectors in the state is faster than that of the U.S. (Exhibits 4-18 and 4-19).

Exhibit 4-17: Container Traffic Through Puget Sound Ports 1998–2008 (1000 TEUs)



Source: Port of Seattle and Port of Tacoma

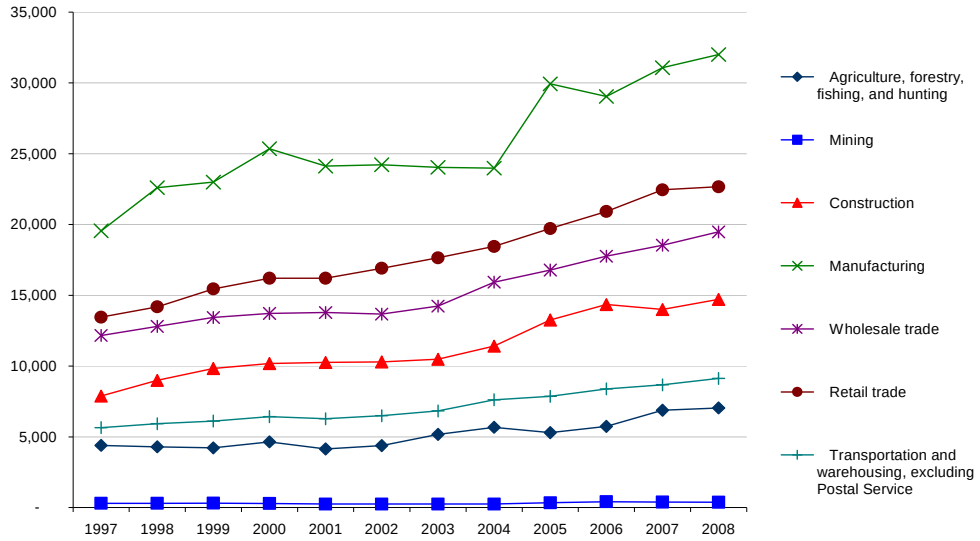
Exhibit 4-18: GDP Growth of Freight-Dependent Sectors – Washington State vs. United States, 1997 to 2008



Note: Freight-dependent sectors include agriculture, mining, construction, manufacturing, wholesale, retail and transportation, and warehousing.

Source: U.S. Department of Commerce, Bureau of Economic Analysis

Exhibit 4-19: GDP Growth by Freight-Dependent Sectors – Washington State 1997 to 2008 ($ Million)



Source: U.S. Bureau of Economic Analysis

Future Demand – Washington State Rail Forecast

Sources

Future demand of rail freight services are assessed based on five main studies (Appendix 4):

- Washington State Transportation Commission (WSTC): *Statewide Rail Capacity and System Needs Study – Freight Transportation Demand Forecasts* (2006).
- USDOT Federal Highway Administration: *2007 Updates of Freight Analysis Framework Forecast.*
- WSDOT/WPPA: *2009 Washington State Marine Cargo Forecast.*
- U.S. STB: *2007 Rail Waybill Sample Data.*
- American Association of State Highway and Transportation Officials (AASHTO): *Freight Demand and Logistic Bottom Line Report* (Draft), 2006.

Methodology and Forecasts

The WSDOT State Rail and Marine Office adopted the forecast results from the above sources. For rail mode related forecasts, 2007 Waybill data are used as a base for projections, since data for 2008 was not available at the time of forecasting.

However, the 2008 and 2009 recession has had profound impacts on the U.S. and world economies and many effects are likely to take many years

to understand. Therefore, the results of the forecasts in this plan could be slightly optimistic from a long-term forecast perspective. The forecasts will be updated as necessary as the data for 2008 and 2009 become available.

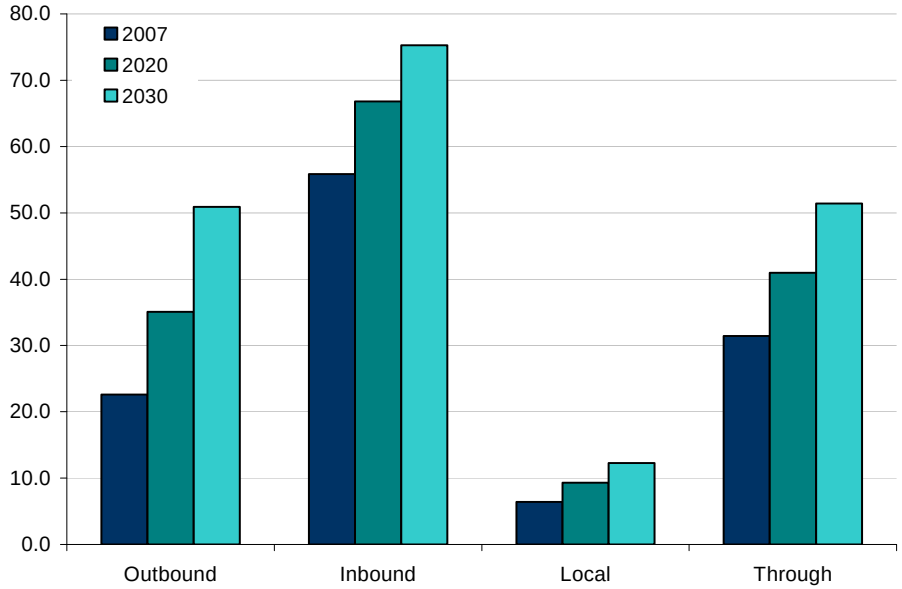
While the most recent recession data for freight is not available and therefore not incorporated into most of the analytical models, the sources used for the forecasts are long-term data. Historical data used in those models reflect the effects of previous recessions. In addition, while the economy went into recession in 2008, state port-related imports and exports started to decline in 2007. Rail traffic in 2007 was not as strong as the economy itself in that year. Therefore, the correction factor of this recession to the forecast results may not be dramatic, but could be significant when the data are incorporated into the long-term trends.

Summary of Rail Freight Forecast

The state's mainline freight rail demand can expect continued growth over the next 10 to 20 years. The railroads are expected to need to move more than 152.1 million domestic tons of freight in 2020, up from 116.3 million in 2007, a 2.1 percent compound annual growth rate. In 2030, it is projected that there will be close to 189.9 million tons needing to be moved, a 2.2 percent annual growth over the 10 years from 2020 to 2030, and a steady 2.2 percent growth rate over the 23 years between 2007 and 2030. Exhibit 4-20 shows the growth of rail tonnage in the forecast years. While local and inbound traffic continue to grow, they will slow to slightly lower levels of growth from 2020 to 2030 compared to 2007 to 2020 growth levels. Outbound and through traffic will both grow at higher rates in the more distant future as compared to the next 10 years.

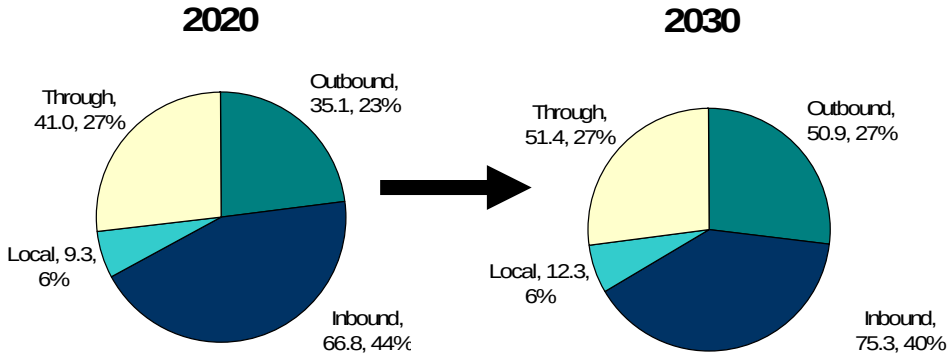
Exhibit 4-21 shows the projected distribution of the inbound, outbound, through, and local shares of the state's total freight rail tonnage for both forecast years of 2020 and 2030. Of all shares, outbound traffic is projected to continue to grow the most between 2020 and 2030, growing from 23 percent to 27 percent between 2007 and 2020, and expanding to 35 million tons. Local and through traffic is projected to continue to maintain approximately 6 percent and 27 percent of the tonnage, respectively, over the next 10 and 20 years. Inbound traffic is projected to encompass a smaller percent of the traffic, as it will claim 44 percent of the tonnage in 2020 and only 40 percent in 2030.

Exhibit 4-20: Washington State Rail Freight 2007, 2020, and 2030 (Million Tons)



Source: WSDOT State Rail and Marine Office

Exhibit 4-21: Rail Freight Distribution (Million Tons)



Source: WSDOT State Rail and Marine Office

The distribution of traffic tonnage by commodity through the forecast years is shown in Exhibit 4-22. Farm products shipped by rail are projected to continue to be a significant tonnage commodity group, growing to more than 64.7 million tons in 2030, up from 36.1 million tons in 2007. Miscellaneous mixed shipments, primarily in the form of imports, are projected to increase from 11.9 million tons in 2007 to 14.3 million in 2020 and 17.6 million in 2030.

Exhibit 4-22: Projected Rail Freight Growth of Top 10 Commodities – Washington 2007-2030 (Million Tons)

Commodity	Year					
	2007	2010	2015	2020	2025	2030
Farm products	36.1	38.8	42.8	48.1	55.2	64.7
Lumber or wood products, excluding furniture	12.9	12.8	12.0	11.2	10.2	9.2
Miscellaneous mixed shipments	11.9	12.6	13.4	14.3	16.0	17.6
Coal	10.6	11.0	12.7	14.8	17.1	19.9
Food and kindred products	7.3	7.2	7.9	9.3	11.0	13.2
Chemicals or allied products	6.8	7.8	8.2	8.7	9.1	9.5
Waste or scrap materials not identified by producing industry	5.1	5.1	5.8	6.6	7.6	8.9
Pulp, paper, or allied products	4.1	4.1	4.2	4.2	4.2	4.3
Clay, concrete, glass, or stone products	3.1	3.4	3.9	4.5	5.1	6.0
Transportation equipment	2.5	2.5	2.3	2.3	2.5	2.8
State Total	**116.3**	**122.2**	**131.9**	**145.7**	**161.9**	**183.0**

Source: WSDOT State Rail and Marine Office - Analysis and forecast based on FHWA Freight Analysis Framework Data and 2007 Surface Transportation Board Waybill data.

2009 Marine Cargo Forecast

In 2009 the WPPA and WSDOT jointly conducted a 5-year update of the *2004 Marine Cargo Forecast*. These two organizations have been providing joint cargo forecasts since 1985. The purpose is to assess the expected flow of waterborne cargo through the state port system and to evaluate the distribution of cargo through the rest of the state's transportation network. The current report is a 20-year forecast of trade (2008 to 2030) moving through the state by water, rail, roads, and current capacity of transportation infrastructure.

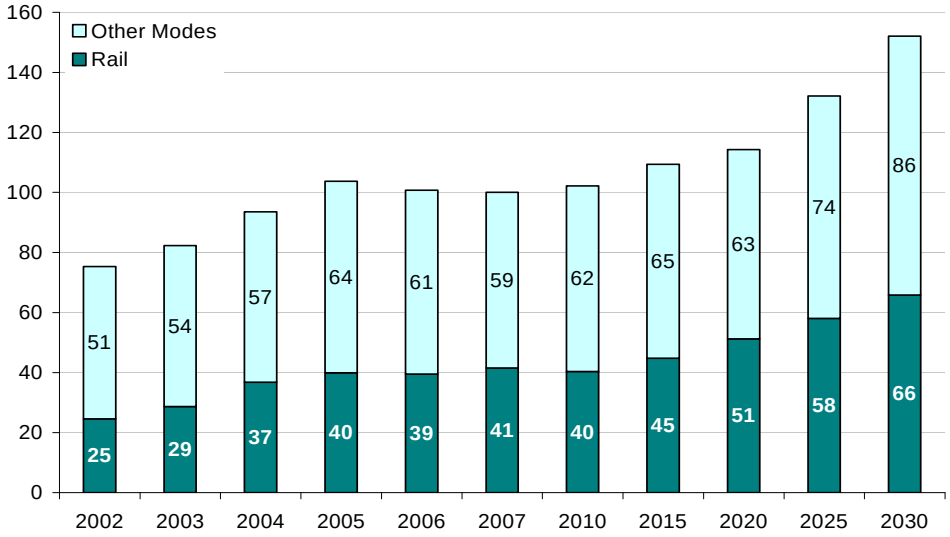
The Marine Cargo study found that rail freight is likely to play an increasingly important role in marine cargo movement. As Exhibit 4-23 and Exhibit 4-24 demonstrate, rail freight demand is expected to account for a larger share of marine cargo movement in the future, due to a higher growth rate than other modes over the forecast period.

Three factors drive increased marine cargo growth. First, U.S. consumption increases as population and living standards increase.

Second, economic globalization makes countries more specialized in production to achieve efficiency. As a result of this globalization, exports and imports increase. Last, containerization of the transportation industry generates more intermodal traffic that demands rail services.

However, the recent economic recession is likely to have impacts on long-term growth potential. Forecast results presented in this section, which did not include the data of this severe recession, are likely to be optimistic. This plan will be updated as the new data and forecast results become available.

Exhibit 4-23: Marine Cargo Trends – Rail vs. Other Modes 2002 to 2030 (Million Tons)

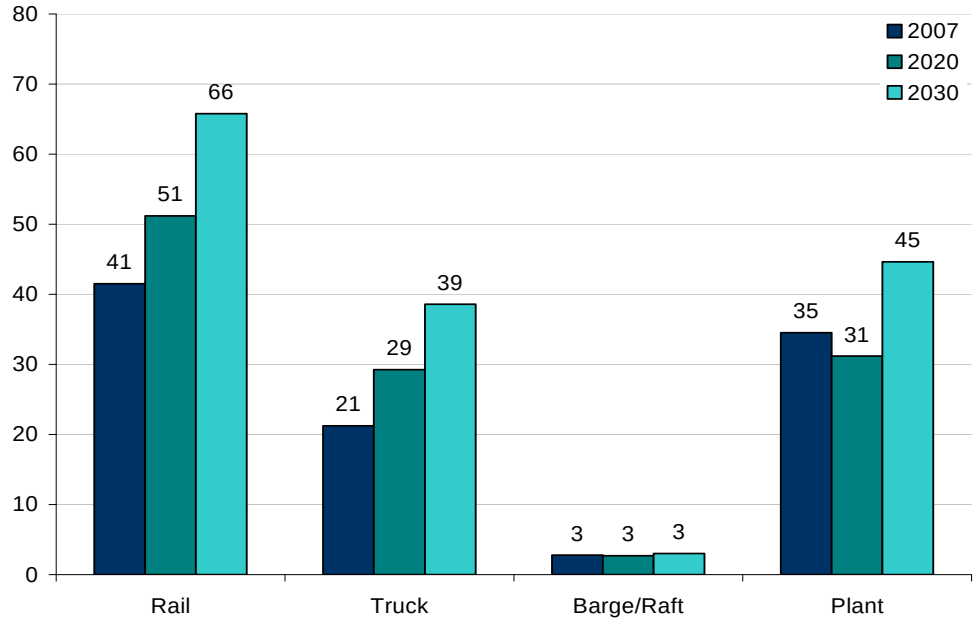


Source: 2009 WPPA/WSDOT Marine Cargo Forecast

Findings identified by the 2009 Marine Cargo Forecast are as follows:

- State public ports have experienced strong and steady growth during the past quarter of a century. State ports have experienced the following increases over the last 16 years:
  - Almost all cargo types have shown substantial gains, with the exception of timber.
  - Cargo volumes at deep water ports have tripled.
  - Containerized cargo has increased 500 percent.
- The study suggests that strong growth can be anticipated into the future. The state's waterborne commerce is expected to grow at slightly less than 2 percent per year through 2030. Growth is anticipated within all cargo categories, although it will vary by commodity type.

Exhibit 4-24: Marine Cargo Port Modal Distribution
Washington State 2007, 2020, and 2030 (Million Tons)



Source: 2009 WPPA/WSDOT Marine Cargo Forecast

Highlights of the forecast include the following:

- **Containers are projected to continue to be the fastest growing cargo type.** State ports can expect continued competition, but the growth opportunities are projected to remain positive for the next 20 years. Container traffic grew from nearly 2.9 million TEUs in 2002 to nearly 3.9 million TEUs in 2007. Puget Sound containerized trade is projected to grow by an average of 4.1 percent per year in the forecast period, reaching 9.7 million TEUs in 2030, given the three drivers (population growth, globalization, and containerization) explained in the previous section.
- **Auto imports will experience rapid growth.** Auto imports are expected to more than double from 690,000 units in 2007 to approximately 1.5 million units in 2030. Competitive rail service will be essential to meeting this demand, as three quarters of auto imports currently move to inland locations by rail.
- **Log exports will level off.** After decades of decline, log exports are expected to level off and remain flat through the forecast period. The loss of log exports has affected many ports, which have responded with successful diversification programs. Many have found niche opportunities, such as importing wind energy equipment.

- **Break-bulk cargo volumes will grow slowly.**[17] Metal, forest products, and other break-bulk cargo will grow slowly due to containerization and structural changes in the industries that produce these cargoes. Much of the expansion will occur as ports diversify. As a result, break-bulk traffic through state ports is projected to grow from 2.3 million metric tons in 2007 to around 3.0 million metric tons in 2030.
- **Grain shipments will expand moderately.** After increasing substantially in recent years, grain shipments are likely to grow modestly in the face of significant domestic and international competition, maximum yields per acre, and maximum acres in production.
- **Dry bulk trends will continue.** Some stalwart cargoes (such as bauxite) have decreased while others (such as petroleum coke) have increased. These trends will continue.
- **Liquid bulk will shift from domestic to foreign.** Both crude oil and petroleum product imports will shift from domestic to foreign sources as Alaskan production tapers off.

Update on National Trends

The demand for freight rail services will grow because the rail freight is driven by three factors (population growth, globalization, and containerization). Assuming moderate rates of economic growth, the tonnage of freight moved in the U.S. is likely to increase three quarters in 30 years (2006 to 2035) (Exhibit 4-25). This rate of growth is about the same as the last 20 years and roughly tracks growth in the U.S. Gross Domestic Product. The following section first looks at the projected growth in the demand for freight traffic (both total and for rail) and then discusses the rail industry response to this demand growth.

The growth in freight tonnage is expected to continue at 2.5 percent to 3 percent per year at least through 2035. The demand for freight rail services is projected to increase by a total of 73 percent based on tons through 2035, assuming continued investment in the rail system to handle growth. Despite this, the rail share of national freight shipments is shrinking slightly. By 2035 rail's share of total freight tonnage is expected to decline from 9.7 percent to 9.5 percent, and rail's share of value could decline from 2.9 percent to 2.8 percent. Exhibit 4-26 shows freight modal distribution in 2006 and 2035.

[17] Break-bulk cargo is cargo that is too big or too heavy to fit into a container or traditionally cannot be vacuumed out of a ship.

Exhibit 4-25: U.S. Shipments by Mode – 2006 and 2035 (Millions of Tons)

Mode	2006				2035			
	Total	Domestic	Exports[3]	Imports[3]	Total	Domestic	Exports[3]	Imports[3]
Total	20,974	18,985	620	1,369	(R) 37,212	33,668	(R) 1,112	(R) 2,432
Truck	12,659	12,389	169	101	22,814	22,231	262	320
Rail	2,040	1,905	41	95	3,525	3,292	57	176
Water	688	582	48	58	1,041	874	114	54
Air, air & truck	15	5	4	6	(R) 61	10	(R) 13	(R) 38
Intermodal[1]	1,503	194	353	956	2,598	334	660	1,604
Pipeline & unknown[2]	4,068	3,909	6	153	7,172	6,926	5	240

[1] Intermodal includes U.S. Postal Service and courier shipments and all intermodal combinations, except air and truck.

[2] Pipeline and unknown shipments are combined because data on region-to-region flows by pipeline are statistically uncertain.

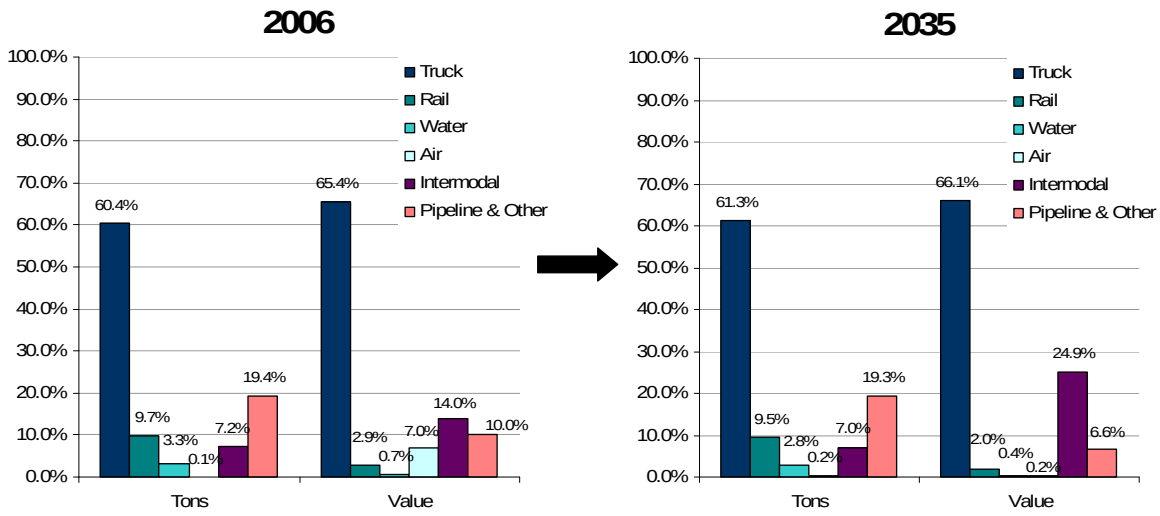
[3] Data do not include imports and exports that pass through the U.S. from a foreign origin to a foreign destination by any mode.

(R) Revised

Note: Numbers may not add to total due to rounding.

Source: USDOT, FHWA, Office of Freight Management and Operations, FAF, Version 2.2, 2007

Exhibit 4-26: U.S. Freight Tons and Value by Mode, 2006 and 2035



Source: USDOT FHWA, FAF, 2007

Rail market share is also shrinking in part because of structural changes in the economy. The U.S. is producing and shipping more value-added products and fewer heavy manufactured goods. Freight shipments are

lighter, less bulky, and higher in value, making them better suited to highway container transport or truck than rail. This trend is expected to continue, with the value per ton going up over the next decade, suggesting more growth in high-value commodities than low-value commodities and more demand for trucking services.

Rail market share also may be shrinking because of the slow pace of rail investment. The industry is purposefully operating near capacity because of its capital intensity, and it is using demand management as well as investment to respond to traffic volumes. This means that some customers are not well served by the market. Railroads, like all private industry, will continue to make capital decisions based on private financial returns, and public benefits will be just an incidental part of the decision unless public capital plays a role. Demand for rail transportation is driven by the commodity markets it serves, as well as by carrier performance. Almost three-quarters of the current national rail tonnage and revenue come from four market groups: coal, farm and food products, chemicals and petroleum, and the intermodal business (listing them in order of tonnage size). Some 40 percent of the physical volume is in coal alone, but the revenue picture is different and more balanced: intermodal and coal each comprise about 20 percent of the revenue (with intermodal somewhat the larger), while the farm and food group and the chemicals and petroleum group comprise about 15 percent each. Roughly 60 percent of all new rail tonnage is attributable to coal and intermodal, and although the top four markets remain the same, by 2035 intermodal should be second only to coal in terms of physical volume, and will be substantially the most important source of rail revenue. The intermodal business is projected to maintain a 3.8 percent compound annual growth rate over the next three decades, causing it to more than triple in size, primarily because of its role in carrying containerized imports for the globalizing economy. Traffic in transportation equipment will also grow at an above-average pace, expanding by 2.6 percent per year and more than doubling in volume by 2035. This business is chiefly automotive products.

Bulk services are dedicated unit trains hauling a single bulk commodity, such as coal or grain. Intermodal services, as defined by the rail industry, are trains hauling international and domestic containers and trailers. All other rail freight, such as chemicals, forest products, and automobiles, move as general merchandise. The long-term prospects of national growth for selected rail commodities through the year 2035 are:[18]

- **Coal** – Rail should remain its primary mode of transport, with a 62 percent cumulative growth in national rail tonnage by 2035.

[18] Forecasts developed by Global Insight and obtained from the AASHTO Freight Demand and Logistic Bottom Line Report (Draft), 2006

- **Farm and Food Products** – Modest growth of slightly less than 1 percent per year, with cumulative growth in 2035 projected to be 21 percent larger than today.
- **Chemical and Petroleum** – Slow growth of less than 1 percent per year and accumulating to a 27 percent increase by 2035.
- **Lumber and Forest Products** – Slow growth around or just above 1 percent per year, and a total increase in rail shipments of 40 percent to 49 percent by 2035.
- **Transportation Equipment** (Automobiles) – Solid growth of 123 percent in tonnage through 2035.
- **Intermodal** – Prospects for rail intermodal business are robust, with tonnage volumes rising 213 percent by 2035.

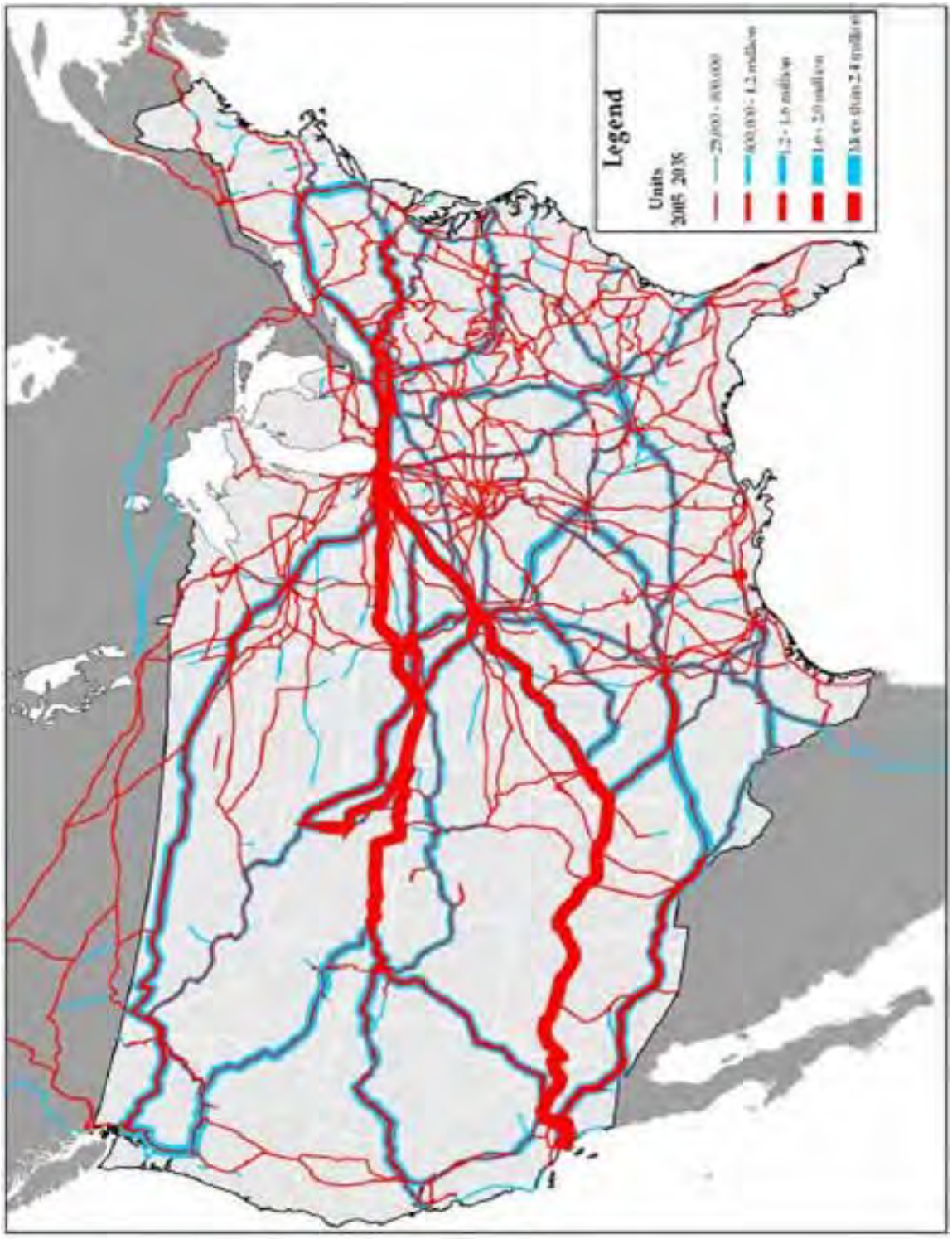
Exhibit 4-27 demonstrates the projected growth demand for rail in the U.S. between 2005 and 2035. More capacity will have to be developed in the rail network in this state. This topic will further be explored in Chapter 5.

Impacts of Freight Rail on Society

All transportation modes (motor vehicles, rail, air, barge, and so on) produce externalities—unintended consequences or indirect effects that are created by some activity. The costs associated with these externalities are not directly charged to any specific individual, but are borne by society as a whole. The negative health impacts associated with air pollution are a classic example of such an externality. Although travel by air, car, or rail creates air pollution impacts, riders, in general, are not charged for their contribution to decreasing air quality. How are these externalities assessed to society? This can be explained by a classic theory in benefit/cost analysis or project investment analysis—with or without analysis—as shown in Exhibit 4-28.

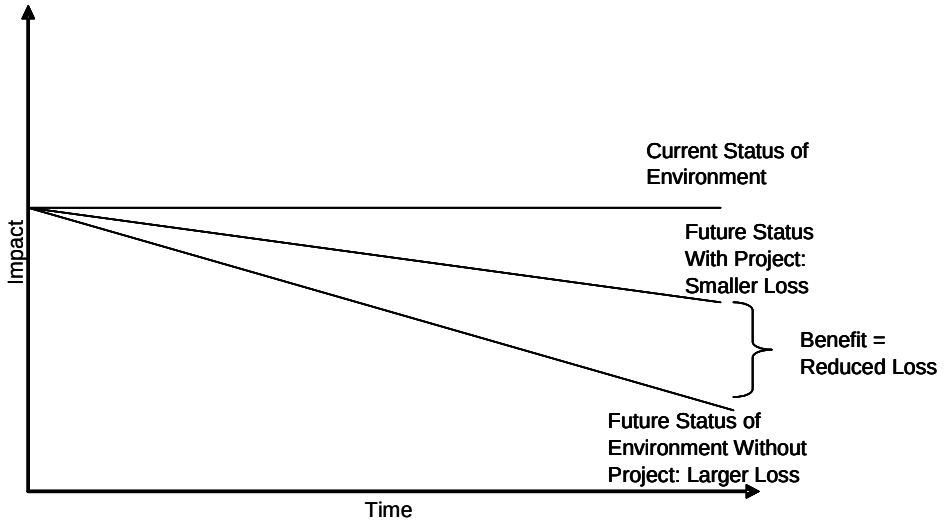
As the chart shows, pollution is likely to increase over time because of current practices. With a project that could lead to less pollution created, society gets benefits by having fewer negative impacts. The reduction in cost of loss would be the benefits of the project invested. This principle applies to freight rail investment. In general, rail has less negative impacts on society. Since rail generates fewer emissions per ton-mile, using rail as an option to ship heavy goods helps reduce pollution. This emission reduction would be the benefit of investment in freight rail.

Exhibit 4-27: Comparison of Total Rail Flow Railcars per Year – 2005 and 2035



Source: AASHTO Freight Demand and Logistic Bottom Line Report (Draft), 2006

Exhibit 4-28: Principle of With/Without Analysis



There are multiple benefits associated with freight rail. The magnitude of benefits received by the people of this state depends on how freight rail will be integrated into the policies. These policies should embrace integrated solutions for interconnected problems. In general freight rail has been identified by many studies to have four categories of societal impacts: transportation benefits; economic impacts; safety, energy, and environmental impacts; and land use impacts.

Transportation Benefits

Low Shipping Costs

Rail provides shippers of heavy materials or large volumes of materials with a transportation option that can be significantly cost effective. Depending on the density of the commodity, one railcar may move the same weight or volume as four or five trucks. For such shippers, rail is usually the low-cost option, and rail rates have been dropping. On average, it costs 29 percent less to move freight by rail today than in 1981, adjusted for inflation. The associated cost savings (in the billions of dollars annually) are vital to the viability of these businesses. The availability of rail service can be an important factor for states and municipalities interested in retaining and attracting these types of businesses. Availability of freight rail can improve the competitiveness of our economy by reducing overall shipping costs.

Intermodal Connectivity and International Trade

Freight-rail service provides a critical link in the nation's intermodal freight transportation system, serving the trucking and maritime shipping industries, and supporting the nation's international trade and global competitiveness. The rail and trucking industries are competitors, but they are also partners. Unless a rail move is "door-to-door," it begins or ends

with a truck move. This could involve the transfer of an intermodal container or the transfer of bulk and carload commodities via transload or transflow operations. Rail and trucking companies are partnering to provide integrated door-to-door intermodal services that optimize the relative strengths and efficiencies of each mode.

Congestion Relief

As the economy and population continue to grow, freeway traffic congestion problems, particularly in the I-5 corridor, will increase. Freight rail can help share some incremental demand, which otherwise would be picked up by trucks. However, the substitutability between highway freight and rail freight is limited. The potential of freight rail as part of the solution for congestion needs further examination.

Transportation Choice

Freight rail provides shippers another transportation option, especially for long-distance and intermodal shipping.

Economic Benefits

Supports Local Communities

Freight rail construction projects bring jobs and revenue to local communities and businesses.

Supports Economic Viability

Freight rail that serves an underserved market can help maintain economic viability of local economies.

Generates Tax Revenues for Public Programs

Rail supports growth of many businesses in various industries that pay business taxes to governments.

Safety, Energy, and Environmental Benefits

Public Safety

Rail transportation has a strong safety record with a lower national accident fatality rate. Freight rail provides an option for policymakers who would like to improve public safety.[19]

Energy Benefit

Freight rail is much more efficient than airplanes and motor vehicles in terms of energy use per ton hauled. Increasing rail capacity will reduce

[19] Government statistics show that freight rail is safer in terms of both fatality and injuries. See Texas Transportation Institute: A Modal comparison of domestic freight transportation effects on the general public. 2007.

the growth of other energy-inefficient modes and help tackle the energy dependence problems.

Pollution Reduction

Emission reduction is an important environmental issue facing transportation operators. The environment plays a fundamental role in determining quality of life and economic well-being for state citizens. The level of released toxic substances and greenhouse gas emissions for freight rail is low.[20] Increasing the use of rail for long-haul freight is an option that would help reduce environmental pollution.

Land Use and Community Impacts

Rail helps reduce land use impacts because it uses less right of way than highway for the same carrying capacity. It also requires less land for yards than the trucking industry based on per ton-mile freight. Rail also releases fewer harmful substances into the environment.

State land use planning authority primarily resides within local government. WSDOT, local governments, and regional governments have a shared responsibility to enhance the quality of life and economic vitality for all state residents while providing a safe and efficient transportation network. Because land use decisions and patterns of land development can significantly influence the safety and efficiency of the transportation system, local government land use decisions, both individually and collectively, are matters of critical importance to WSDOT and freight owners. The Growth Management Act, the Shorelines Management Act, and the State Environmental Policy Act provide WSDOT with opportunities to coordinate and communicate with local governments as they draft plans and regulations that may affect the state transportation system. These acts ensure the needs of both the communities and the freight owners are met.

[20] AASHTO: Railroads provide significant environmental benefits. The U.S. Environmental Protection Agency estimates that for every ton-mile, a typical truck emits roughly three times more nitrogen oxides and particulates than a locomotive. Related studies suggest that trucks emit six to 12 times more pollutants per ton-mile than do railroads, depending on the pollutant measured. According to the American Society of Mechanical Engineers, 2.5 million fewer tons of carbon dioxide would be emitted into the air annually if 10 percent of intercity freight now moving by highway were shifted to rail.

Washington State Department of Transportation

Chapter 5: The Changing Rail System – Issue Discussion and Needs Assessment

Overview of Issues and Needs Assessment

This section presents short- and long-term freight rail needs in Washington State (state). The assessment is based on data provided directly by the state's freight railroads, ports, public agencies, and other key stakeholders. In total, this needs assessment identifies 109 short- and long-term capital improvement projects and other initiatives. Several freight rail needs have been included in this total, even though they have not progressed to the point of having full solutions and cost estimates. The total cost for the projects, where cost estimates are available, is $2.0 billion.[1]

Key Issues

The key issues addressed in this section are rail system needs, abandonment, port access and competitive needs of the ports, intermodal connectors, and emerging issues and data needs. Each of these topics is described in detail in this chapter.

Purpose of the Needs Assessment

The primary purpose of the needs assessment is to develop a reasonably comprehensive list of necessary or desired freight rail improvements. This list will allow the Washington State Department of Transportation (WSDOT) to gauge the condition of the system and assess potential public involvement. Railroad needs, for the purposes of this rail plan, are restricted to capital needs and do not include operating expenses or subsidies. A need for this plan is defined as a need regardless of whether it is privately- or publicly-funded or remains unfunded. Thus, the needs included in this assessment should be considered "unconstrained" needs and not a funding commitment.

WSDOT will review and evaluate these needs when determining appropriate levels of public support for a project. Inclusion of a need in the *Washington State 2010-2030 Freight Rail Plan* does not constitute a commitment on the part of WSDOT or the state to provide funding. As comprehensive as this plan attempts to be, it must be noted that this document does not include all freight rail needs.

[1] Twenty-one projects did not report a cost for their project.

The freight railroads are private, for-profit businesses and in some cases did not submit all their capital needs for inclusion in this public document. This is especially true in cases where private capital is available to fully fund planned improvements. Traditionally, railroads are less likely to submit projects where the railroads believe that public involvement in specific projects is less likely or where disclosure of a need could adversely affect their strategic business ventures. Therefore, the needs that are listed in this section are only those projects that have been specifically submitted for inclusion in this list of projects.

Methodology

WSDOT compiled a list of needs for the state's freight rail system from prior studies, a survey, and a set of interviews and reviews with key stakeholders. Specifically, the freight railroads, the ports, and other stakeholders were engaged in this effort. The needs range from well developed plans that have been through a full planning and design process, to new concepts, to a wish list of projects. This is why not all projects have full information in the list contained in Appendix 8-A. The only restrictions on the needs submitted for inclusion in the list were:

- The needs focus on freight rail projects, since passenger rail needs continue to be identified in other studies. Although some passenger rail needs were included, especially when they also impact freight operations, this list should not be considered a comprehensive list of passenger rail needs.
- The needs focus on projects that improve the movement of rail freight. For example, improvement of a road-rail grade crossing to help mitigate highway congestion is not a freight rail need; it is generally classified as a safety issue.
- The needs focus on capital improvements, and do not include operating expenses for the freight railroads. The freight rail system is dynamic and driven by customer demands and trends.

Therefore, needs continually change. The needs in this plan are current through October 2009, and were assembled with the procedure outlined in Exhibit 5-1 below.

Exhibit 5-1: Procedure for Collecting Freight Rail Needs

Timeframe	Activity
June 2009	Held initial stakeholder meeting.
August 2009	Requested railroads, ports, and other stakeholders fill out survey of needs.
September 2009	Conducted initial in-person interviews with some of the railroads and ports.
October 2009	Reviewed the list of needs for duplicates and incomplete information. Followed up with reminder telephone calls and clarified any questions.
November 2009	Sent out to the railroads, ports, and stakeholders for final review, and conducted final round of follow-up questions as necessary.

Rail Abandonments: Recent, Proposed, and At-Risk Lines

Abandoned Rail Lines

Current Abandoned Lines

Exhibit 5-2 shows the abandoned rail lines 1998 and before, and the current abandoned rail lines (1999 to 2009) in the state.

As of the *Washington State Freight Rail Plan 1998 Update*, there had been a total of 1,975 miles of rail lines (132 segments) abandoned from 1953 to 1998. Since 1998 there has been an additional 70.23 miles abandoned. A list of abandonments from 1953 to 2009 can be found in Appendix 5-A.

This state has one of the best state rail preservation and development programs in the country. The state has invested $99 million in its rail freight infrastructure since 1980. An additional $35 million in investment is anticipated from 2010 to 2012 (see Exhibit 5-3).

These investments include the Freight Rail Assistance Program ($6 million 2007-2011) and Freight Rail Investment Bank Program (Rail Bank) loans. The Rail Bank has $7.5 million in funding available from 2007-2011, with a maximum loan of $250,000. All of these investments have been in regional and small railroads, in recognition of the fact that these railroads are a vital component of the state's transportation system and economic well-being.

Exhibit 5-2: Abandoned Rail Lines

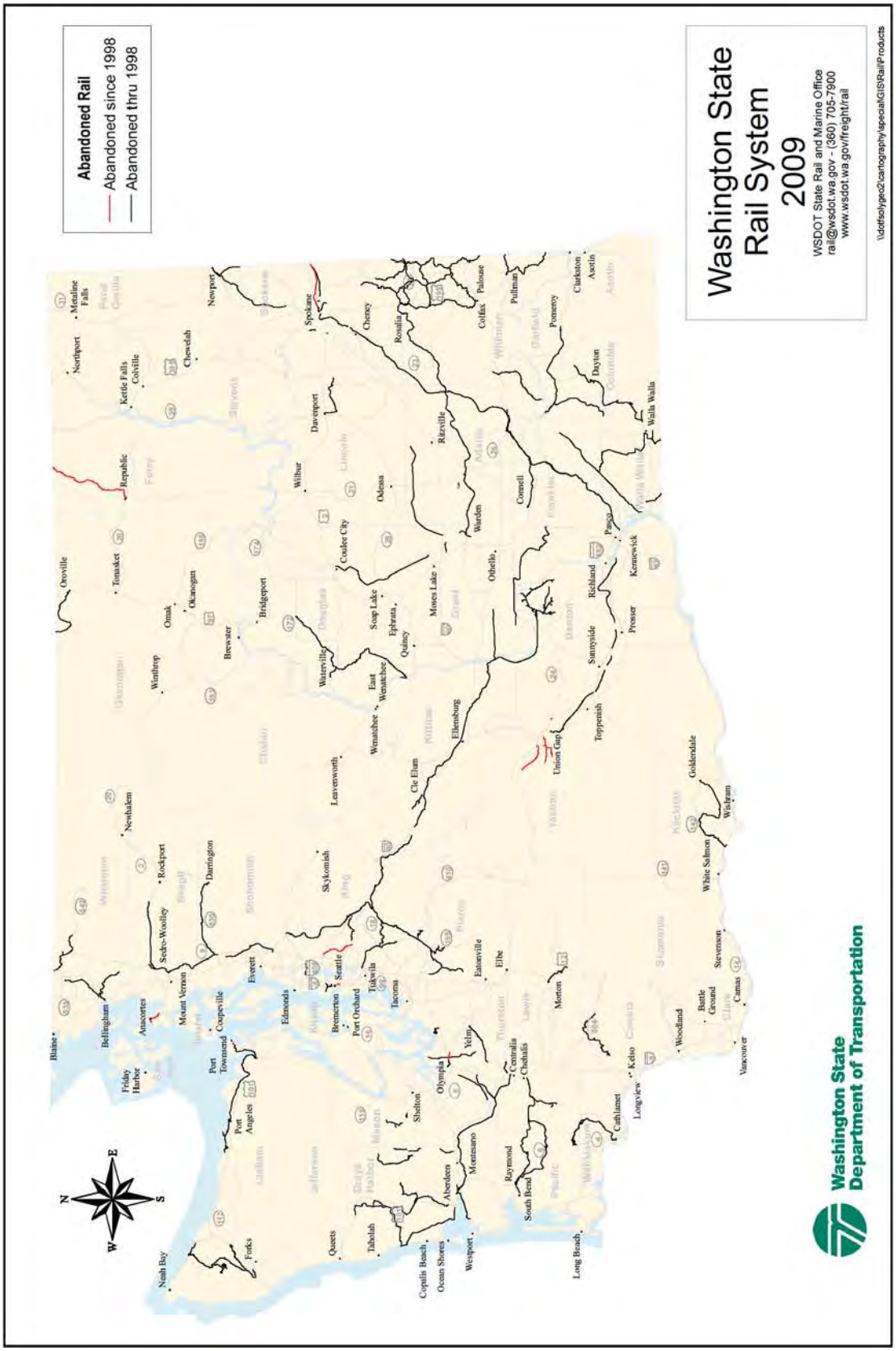
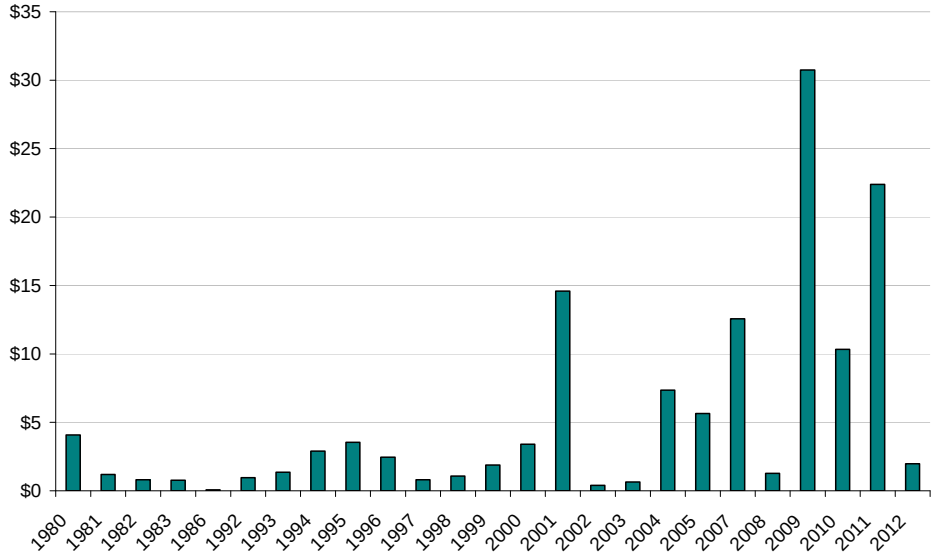


Exhibit 5-3: Washington Rail Investments ($ Millions)



Source: WSDOT State Rail and Marine Office

Rail abandonments have been widespread in the United States (U.S.) since the passage of the national railroad reform legislation, ending most federal regulation of railroads, over 20 years ago. Given a greater opportunity to control costs and generate revenues, Class I railroads sold, abandoned, or leased their less profitable lines. This proved to be an opportunity for others; a great many short-line railroads were formed to operate lines divested by Class I railroads. In other cases, rail lines were abandoned and the real estate was used for other purposes.

The state's rail abandonment program is assisted by the federal government through the Local Rail Freight Assistance program. The state has been one of several states that has worked to preserve rail infrastructure. This program has preserved and developed rail lines that would otherwise have been abandoned. This has been very important in meeting present and future transportation needs.

Many of the short lines around the nation and in the state were created from branch or light density lines of the larger Class I railroads. These lines were either abandoned or sold by the Class I railroads during their industry restructuring of the 1980s and 1990s. Most of the lines sold through the abandonment process by Class I railroads were in poor[2] physical condition at the time of abandonment. Many of these branch lines have sections of lighter rail than is necessary for today's new railcar load limits and weight-restricted bridges.

[2] Poor physical condition is track that is in disrepair from wear and tear or has deteriorated due to lack of maintenance.

As illustrated in Exhibit 3-5 in Chapter 3, there are 19 active short-line railroads operating in the state. The majority of these railroads operate on light density lines that were divested by the Class I (mainline) railroads. They are located throughout the state and play a critical role in moving a wide variety of products, including agricultural products, frozen foods, lumber, gravel, and petroleum products. Often locally-owned and operated, many short-line railroads in the state keep hundreds of small businesses and communities connected to the national mainline rail system.

Many of these branch lines were sold by the Class I railroads because they could not make a profit operating these light density lines. Nearly every short-line railroad began its existence with track that had received little investment under previous owners. Whether they are municipally or privately held, many short lines are in need of infrastructure funding for rehabilitation or improvement.

These existing lines present an opportunity to the state. In many cases, improvements for the state's short lines involve upgrades to existing infrastructure, rather than capacity expansion projects that involve more significant environmental issues. They should therefore be able to move more readily from planning to construction. A review of the most recent WSDOT short-line funding proposals indicates that most of these projects involve improvements to existing infrastructure. In many cases these improvements involve increasing track capacity maximums from 263,000 pounds per car to 286,000 pounds per car to meet Class I railroad requirements. Upgrading track to handle the heavier cars may make economic sense, if it results in an increase in the amount of traffic on a line. However, if cargo volumes remain the same, but the number of carloads decreases due to the heavier loading, the benefit is less clear. This is especially the case if the contract between the short-line operator and the Class I railroad is on a per-car basis, in which case the reduced number of cars would result in reduced revenue. Some short lines are more successful than others, and the viability of each depends on its own particular circumstances. Those short lines that have faced ongoing problems with cash flow and capital for infrastructure improvements are the ones most at risk. WSDOT has been able to assist many of the short lines with project funding, but these infrastructure investments may not be sufficient to make each short line economically viable. However, even if lines are marginal, there may be a compelling state interest in supporting these lines in order to reduce truck traffic or to maintain jobs, among other reasons that serve the public interest.

To determine future potential abandonments, the WSDOT State Rail and Marine Office surveyed the rail industry with the results below in Exhibit 5-4. The exhibit shows the results of the survey taken in summer

2009, which reported that there are four potential future abandonments and one anticipated re-opening.

Exhibit 5-4: Abandonment Survey List – Likely Abandonments

Submitted by	Railroad Owner	Railroad Operator	Location
Port of Grays Harbor	PSAP	PSAP	West of Hoquiam River
Port of Othello	State of WA/ Columbia Basin RR	Closed	Reopen Milwaukee Line
Port of Seattle	BNSF	BNSF	Eastside Line: Woodinville/Renton and Woodinville/ Redmond
Union Pacific	UP	None	Yakima Industrial Lead, MP 57.3 to MP 58.75
Union Pacific	UP	None	Yakima Industrial Lead, MP 62.75 to MP 63.55

Projection of Future Abandonments and Their Impacts, Capacity, and Needs Forecasts

When a rail line is abandoned, it is critical that the integrity of the right of way be maintained. If an abandoned line ends up parceled off piece by piece, it would be extremely difficult, if not impossible, to reconstruct the line for a future transportation use. Given the limited opportunity to expand the highway system, an abandoned railroad right of way represents an extremely valuable transportation resource.

As a result of the decrease in route miles, many of the state's communities no longer have access to rail service. To counter that trend and support economic development initiatives of the state, the WSDOT State Rail and Marine Office has implemented a rail line preservation initiative to retain the potential of rail service along these abandoned routes.

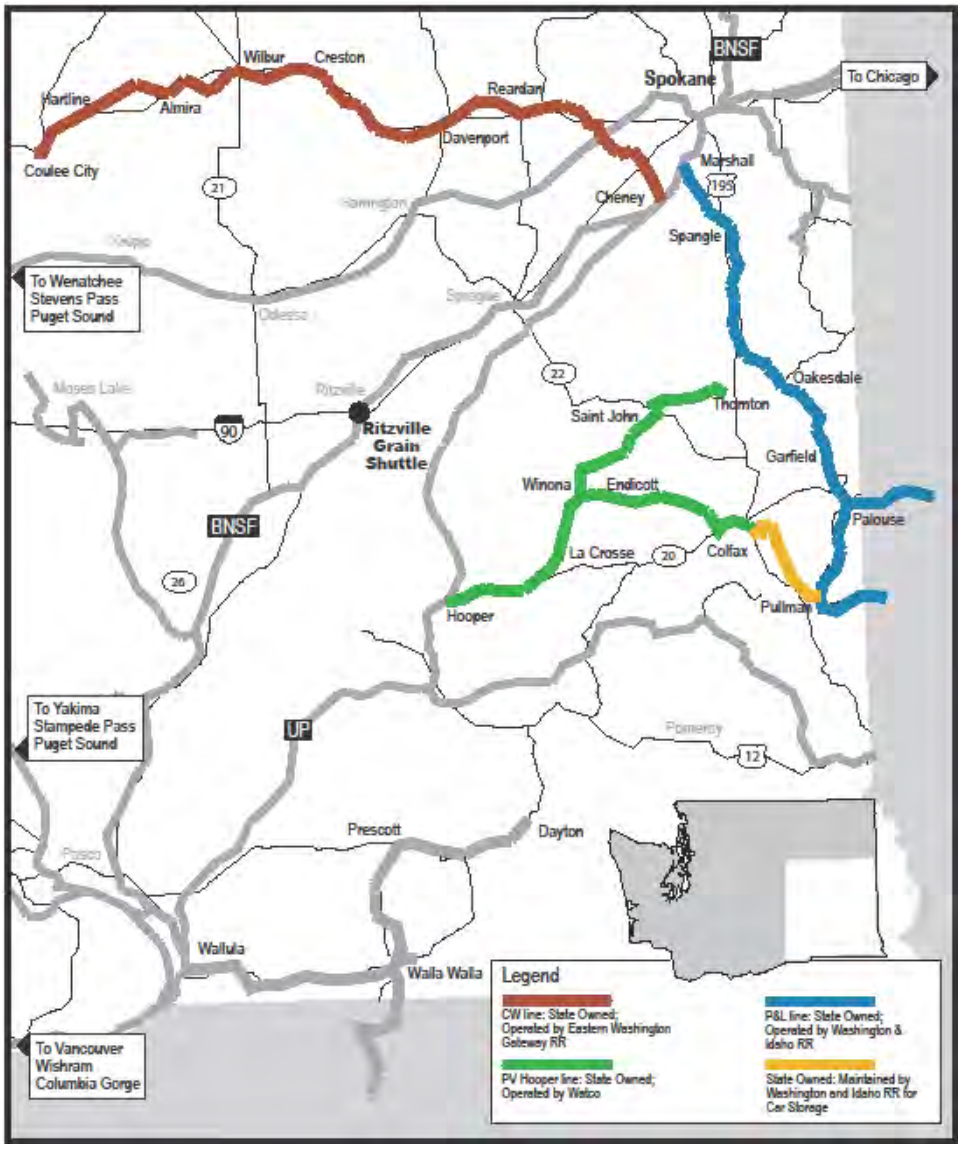
Examples of Successes

Purchase of the Palouse River and Coulee City Rail System

The state currently owns the former Palouse River and Coulee City Rail System, which consists of three branches (see Exhibit 5-5). WSDOT purchased the rights of way and rail on the P&L Branch and PV Hooper Branch of the rail system in November 2004. WSDOT purchased the CW Branch and the remaining rights in the other two branches in May 2007.

WSDOT contracted with private railroads to operate each of the branches. The Palouse River and Coulee City Railroad operates the PV Hooper Branch; the Eastern Washington Gateway Railroad operates the CW Branch; and the Washington and Idaho Railway operates the P&L Branch.

Exhibit 5-5: Palouse River and Coulee City Rail System



WSDOT oversees the facilities and regulatory portions of the operating leases. The Palouse River and Coulee City Rail Authority (an intergovernmental entity formed by Grant, Lincoln, Spokane, and Whitman Counties) oversees the business and economic development portions of the operating leases.

The Palouse River and Coulee City Rail System currently provides local rail service to grain shippers and other businesses in Whitman, Lincoln,

Grant, and Spokane Counties. The three lines require rehabilitation to remain commercially viable.

Public ownership of the Palouse River and Coulee City Rail System capital assets provides an opportunity for private operators to provide economically viable rail service to shippers along the lines. Rehabilitation is needed to correct the effects of decades of deferred maintenance. Many places along the lines must be operated at a speed lower than would be allowed if the lines had been properly maintained on an ongoing basis. Rehabilitation will prevent further deterioration, help raise operating speeds in some locations, and make the operation of the lines more efficient and commercially viable.

Rail Banking

Rail banking is used by the state when the state has an interest in retaining rail lines that have been abandoned, should they become economically viable at a future date. If it appears that a line could become economically viable within ten years, the line may be rail banked or purchased by the state to prevent its loss as a rail corridor. A rail banked line may be used as a trail on an interim basis. Maintenance or other changes on a rail banked line used as a trail must preserve the ability to use the line as a railroad in the future.

A good example of this is the Milwaukee Road Corridor (Milwaukee Road). In the 1980s, the state acquired the abandoned Milwaukee Road and, through legislation, gave much of the line to the Washington State Parks and the Department of Natural Resources. Both segments are managed by their respected departments as a recreation trail. Washington State Parks created a trail along the railbed with their part of the line. It is now known as part of the John Wayne Trail. In its heyday, the Milwaukee Road was a vital trade link between Seattle and the Midwest and was the world's longest electric rail line at the time. The railroad bed follows I-90 across Snoqualmie Pass. The 100-mile portion from Cedar Falls (near North Bend) to the Columbia River near Vantage has had the tracks removed and the area has been turned into a state park, known as Iron Horse State Park. On average, the trail is about a half mile from the highway and about 300 feet higher. The trail follows the former railbed of the Chicago, Milwaukee, St. Paul, and Pacific Railroad two-thirds of the way across the state. The gravel pathway offers hikers, bicyclists, equestrians, and cross-country skiers a chance to travel along the historic Milwaukee Road right of way on a gentle, easy-to-negotiate grade. In 2006 WSDOT was given the authority to enter into a franchise agreement for a rail line over the portions of the Milwaukee Road between Ellensburg and Lind by July 1, 2019.[3]

[3] RCW 79A.05.120.

Port Access

Port access to rail service is very important to the vitality of the ports in the state. As economic development agencies, ports are a fundamental part of the state's economy. State ports face substantial competition from other ports and shipping routes. The majority of the cargo that comes through state ports is discretionary cargo (i.e., containers, autos, grain, dry bulks, and break-bulk cargos) that can shift to other gateways, if shipping through these other ports becomes more efficient or cost effective than using state ports. To be competitive, ports must have good rail access. As an added benefit, rail is a community-friendly mode, as it is a safe, energy-efficient way to move goods along major corridors.

Washington State Ports

The state has 75 ports, not all with water access, as shown in Exhibit 5-6. The state has 11 deep-draft ports, a tremendous asset for the state's economy. Seven of these ports are on the Puget Sound. The largest ports, the Ports of Seattle and Tacoma, together comprise the third largest container load center in the nation—behind the load center complexes of Los Angeles/Long Beach and New York/New Jersey. One deep-draft port, the Port of Grays Harbor, is located on the coast; and three are located on the Columbia River. Together, these ports create a seamless network that sends goods to global markets, and imports goods from other countries, bound for in-state stores and other destinations across the U.S.

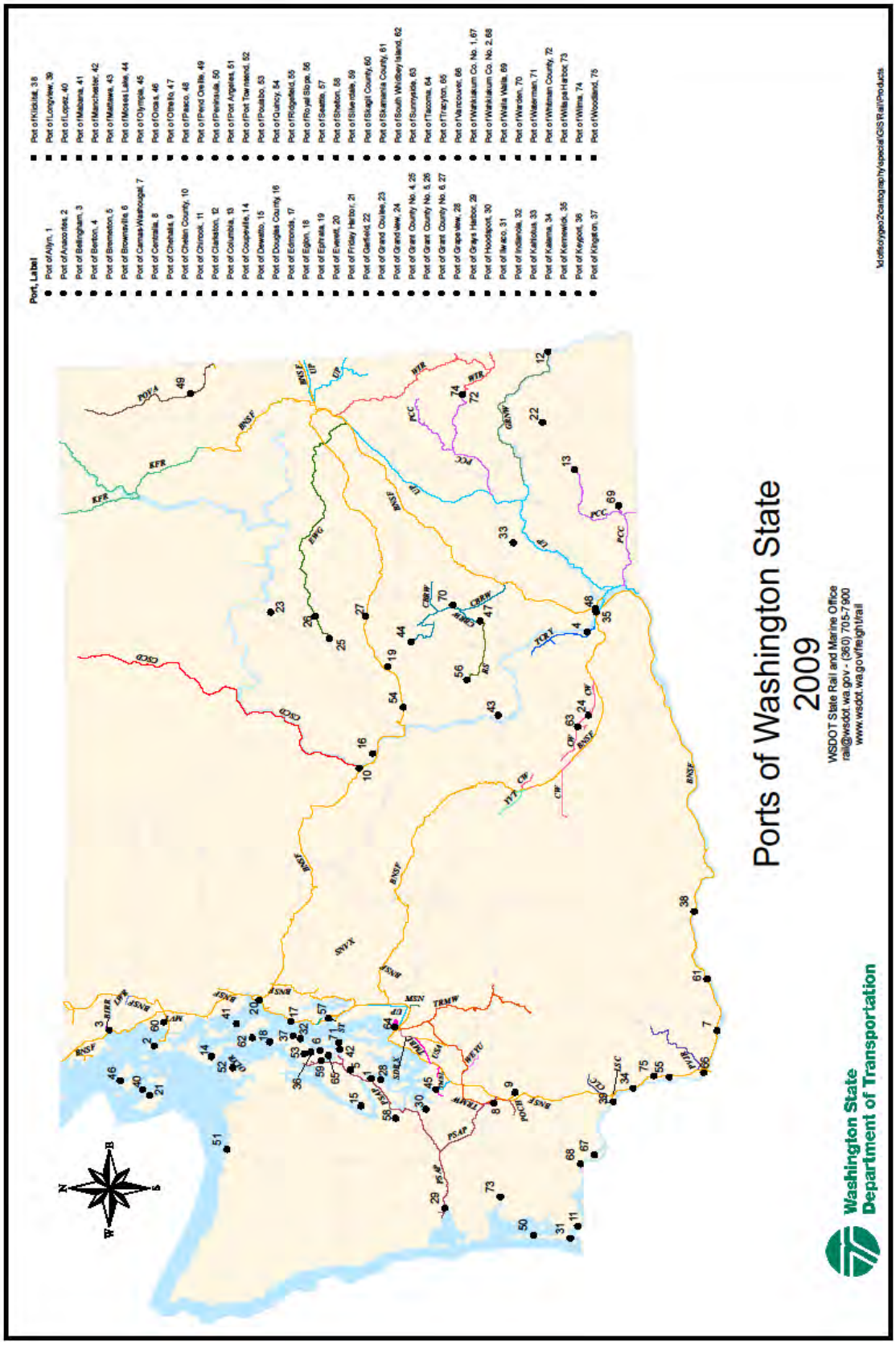
The Columbia/Snake River system stretches 365 miles inland from the Pacific Ocean. The three deep-draft ports along this system—Longview, Kalama, and Vancouver, Washington (WA)—are major shipping centers for the state. Upstream, the Ports of Klickitat, Pasco, Kennewick, and Benton are served by barge along the Columbia River. The Ports of Whitman County, Walla Walla, and Clarkston are served by barge along the Snake River.

Although there are many ways to classify ports in the state, this plan has selected four classifications:

- Intermodal Ports.
- Agricultural and Bulk Ports.
- Rail-Dependent Break-Bulk and Industrial Ports.
- Rail-Serviced Industrial Ports.

The following is a listing of ports by category. It should be noted that some of the larger ports will be listed multiple times depending on their diversity.

Exhibit 5-6: Washington State Ports



Intermodal (Container) Ports – Seattle and Tacoma

These ports have on-dock and off-dock intermodal rail yards, where containers are loaded directly from ships to rail, removing the need for truck drayage. The cargo is transported from ship to rail either by truck or yard equipment (in the case of on-dock rail). Unit trains of containers are built by destination and usually depart within 24 hours of ship arrival. The majority of these containers are destined for the Midwest and Upper East Coast regions.

Agricultural and Bulk Ports, (primarily grain elevator facilities) – Garfield, Grays Harbor, Longview, Kalama, Seattle, Tacoma, Vancouver (WA), Snake River Elevators: Almota, Clarkston, Lewiston, Walla Walla, Whitman, and Wilma

By tonnage, 36 percent of all state agricultural shipments move by rail. Agricultural rail traffic outbound from this state is expected to grow at a compound annual growth rate of 3.3 percent over the next 20 years. The state also has a growing food products industry with particular strengths in frozen foods (7.3 percent of U.S. output) and wine production.

Agriculture and food product manufacturers are an important economic sector in the state, generating 3 percent of the gross state product and accounting for 6 percent of the employment. Agriculture is the major source of employment in many of the state's rural counties.

However, most of the agricultural tonnage moving on the state rail system is Midwestern grain moving to the Lower Columbia River and Puget Sound ports for export. And because Midwestern grain is moving long distances by unit train, the Midwest grain is generally more profitable for the railroads than local state agricultural shipments, which often are moving shorter distances for export or require specialized handling. Products such as wheat, corn, and soybeans, from the Midwest and eastern Washington, also travel by barge and rail to these Lower Columbia seaports.

The Class I railroads are asking state agricultural shippers to consolidate their shipments at new facilities (such as the Ritzville loader), and this may prove economical for those shippers who can accommodate the changes. These changes may affect the short lines, which could see declines in their market share. There is a concern by the operators of small grain elevators along the short lines, who also stand to lose business. The remaining shippers on that line could also experience reductions in service and increased costs.

The challenge faced by the Department of Agriculture, the Agriculture Commission and the WSDOT State Rail and Marine office is to maintain

competitive rail service as it focuses on higher value-added crops and produce that may not generate the volumes that are attractive to Class I railroads.

Rail-Dependent Break-Bulk and Industrial Ports – Anacortes, Everett, Garfield, Grays Harbor, Kalama, Longview, Olympia, Seattle, Tacoma, and Vancouver (WA)

Break-bulk cargo is too big or too heavy to fit into a container or traditionally cannot be vacuumed out of a ship. There are, however, exceptions, such as "identity preserved" or "designer" bulk grain that is blown into containers for transportation in order to keep the origin of the crop separated from other production sources. Historically, the major commodity groups moved in break-bulk form to and from Pacific Northwest ports have included apples and other fruit, metals, and forest products. Apples were at one time one of the most important break-bulk cargos, but they have essentially become 100 percent containerized. Some cargos that move in break-bulk form can also move in containers (so-called "swing" cargos), and the differences in pricing between the two modes can lead to cargo shifting from one to the other, while others have moved completely to containers. Although a number of factors influence whether swing cargos are shipped in break-bulk or containerized form—such as westbound trans-Pacific container rates, frequency of sailings, and the size of overseas orders—price is probably the most significant factor. Shipping lines have added so much container ship capacity to satisfy demand for U.S. imports from Asia that there has been substantial excess westbound capacity. This resulted in a decrease in westbound container rates, which attracted break-bulk swing cargos. Another general trend impacting break-bulk cargos has been a continuing decline in exports of forest products. This decline has been offset by the increase in imports of metal products.

Here are examples of break-bulk cargos moved by the different ports:

- The Port of Port Angeles serves as a gateway for logs and lumber.
- The Port of Anacortes exports logs, chemicals, and petroleum coke from the Anacortes oil refinery.
- The Port of Bellingham handles break-bulk and liquid-bulk commodities.
- The Port of Everett handles fruit, logs, general break-bulk, and some containers.
- The Port of Olympia specializes in handling break-bulk, ro-ro (roll-on, roll-off), bulk, forest products, and containerized cargos.
- Port of Tacoma break-bulk includes wide and heavy cargos such as farm machinery, large factory/production parts for the Canadian Oil Sands, large motorized vehicles.

- Port of Vancouver, USA handles a large volume of wind energy components and has developed a successful "land bridge" rail strategy for moving these components to the U.S. Midwest and western Canadian destinations in addition to other break bulk commodities.

Rail-Serviced Industrial Ports – Benton, Bremerton, Chelan, Clarkston, Columbia, Ephrata, Garfield, Kennewick, Mattawa, Moses Lake, Othello, Pasco, Quincy, Ridgefield, Royal Slope, Shelton, Sunnyside, and Whitman County 3 & 4

The above-named ports have rail-served industrial property. In many cases these ports do not have water access although, through their economic development capacities, these ports are able to provide land and facilities that are rail-served, enabling the local community to have rail access.

Port access issues are more closely related to location than to type of port. Some of the current access challenges and related projects are summarized below. It should be noted that several of the ports have significant rail projects currently underway or scheduled for the near future.

The Military and Rail

Another area of break-bulk cargo that is sometimes forgotten is the U.S. military cargo that moves through the state annually via multiple break-bulk ports. The growth of the state's bases is due in part to the freight infrastructure system's ability to support the U.S. military's readiness and operational movements.[4] Military facilities in the state are important contributors to the U.S. defense and national security system. This state is home to the largest Army base on the West Coast, two Air Force bases, six critical Navy facilities, and two military medical centers. The military's ability to efficiently move freight in and through the state is dependent on an effectively functioning intermodal freight movement system. Specific freight mobility issues for the military in the state are summarized below.

Puget Sound seaports have a strategic role in support of Fort Lewis as the only Power Projection Platform—for gathering, staging, and mobilizing forces and material—on the West Coast. If a major military conflict were to trigger mobilization activity, inbound cargo needed for that mobilization would travel by road and rail from across the U.S. to Fort Lewis, for shipment through the Port of Tacoma to points outside the country.

[4] Surface Deployment and Distribution Command – Transportation Engineering Agency: 2004. This information is provided to the state for planning purposes.

Under such a scenario, it is expected that the Port of Tacoma would need to handle daily volumes of up to 600 containers, 350 rail cars, and 1,100 wheeled vehicles. This volume could create truck bottlenecks at the Interstate 5 (I-5)/Port of Tacoma Road exit and rail chokepoints at Bullfrog Junction in the Port of Tacoma tideflats.

In 2004 the military also began using the Port of Olympia for shipments out of Fort Lewis. The efficient movement of cargo may be hindered because of needed rail capacity enhancements at the ports. There has been a five-fold increase in the number of rail cars that have passed through the Port of Olympia since 2002. At that time 168 cars came through the Port of Olympia. It increased to 876 in 2004. The return of Army shipments related to the Iraq War accounted for about 17 percent of rail volume. In response, the Port of Olympia spent $1.4 million to add a rail line on its docks closer to where ships berth.[5]

The Port of Seattle also has as a role in supporting overseas military logistics. The Port of Seattle has been designated as a sustainment port, one that will be used to ship consumable supplies to troops in the event of a major overseas conflict. Under this scenario, 300 to 600 containers of supplies could arrive on 100 to 350 rail cars on a typical day, with a peak of up to 1,100 containers per day. Military logistics officials have expressed concern about potential bottlenecks when accessing Terminals 5, 18, and 46 at the intersection of East Marginal Way and South Spokane Street, and the single railroad track access under the Spokane Street Bridge to the Port's terminals. The Port of Seattle is working to solve this problem through an East Marginal Way grade separation.

In addition to the ports named above, there are Ordnance Transport Requirements for Bangor, provided by the state rail system. Ordnance is delivered to the Port Hadlock Naval Ordnance Center via rail car to Bangor on the Hood Canal, and then trucked to Port Hadlock.

Autos and Rail

Fully assembled autos are imported primarily through the Ports of Tacoma and Vancouver (WA). These are discharged from the ports on rail and truck. In order for these ports to keep these auto accounts, reliable rail service is a must; there is also a competitive advantage compared to San Pedro Bay in Los Angeles, California as the Pacific crossing is one day less.

[5] As reported by Szymanski, Jim, *Rail cargo business chugs along at port*. The Olympian. Sunday, February 27, 2005. Retrieved as of February 2005 from: www.theolympian.com/home/news/20050227business/96117.shtml.

Key Needs of Ports

Nearly all of the state's deep-water ports are located adjacent to the I-5 corridor, or are on short-line railroads that branch off the I-5 corridor. As a result, rail connectivity issues for the ports and capacity issues on the I-5 corridor are necessarily tied. Along the corridor there are five main areas where mainline capacity needs and connectivity issues intersect, including:

- Vancouver (WA).
- Kalama to Longview.
- Centralia.
- Tacoma.
- Seattle.

Each of these is examined in more detail in Appendix 5-B.

WSDOT, as the state agency that administers state and federal transportation funds that are spent on rail projects in the state, works closely with port districts to improve freight rail access throughout the state. These rail projects help the state's business community gain better access to rail transportation. As referenced in other areas of this plan, examples of past WSDOT projects include purchases of grain hopper cars, rehabilitation of short lines, purchase of branch lines, and preservation of abandoned rail right of way.

Intermodal Connectors

These are locations where two modes meet and the cargo moves from one mode to another. In most cases this involves transferring a piece of cargo from a truck to a train or vice versa.

Within this label, intermodal connectors can be seen in many different types of facilities. The following describes some of these facility types.

Inland Ports

Rail access is a significant element of port competitiveness strategy. By providing an inland port service, a seaport (in theory) can make intermodal rail service available to a broader range of customers. If priced sufficiently low, the inland port service can offer cost savings to container shippers and thereby increase the port's competitiveness.

Inland ports have become an increasingly popular concept as the drive for transportation efficiency continues. Inland ports are perceived to reduce congestion, improve transit times and reliability, while at the same time

decreasing costs and promoting economic development. For a detailed discussion of inland ports, see Appendix 5-C.

Other Intermodal Connectors Within the State

In addition to rail-served inland ports, the two most prominent alternatives for rail transportation are on-dock intermodal and near-dock intermodal.

On-Dock Intermodal

Port of Seattle

Terminals 5 and 18 have on-dock intermodal facilities within the terminal footprint (see Exhibit 5-7). Both on-dock intermodal yards can load international containers from the ship without using a public street.

Port of Tacoma

The Port of Tacoma has four intermodal yards; three are on-dock and one near-dock. These four yards are served by Tacoma Municipal Belt Line, the short line that serves the Tacoma Tideflats area. All four of these intermodal yards were built by the Port over the years to meet customer needs (see Exhibit 5-8).

Near-Dock Intermodal

South Intermodal Yard in the Port of Tacoma is a near-dock intermodal facility located on Milwaukee Avenue near the entrance of the APM terminal. It is operated by a third-party operator, Pacific Rail Services, under the direction of the Port of Tacoma. It has direct street access and has the capability of loading or unloading directly to road-ready trucks.

Seattle is supported with two near-dock international intermodal facilities, the BNSF Railway's (BNSF) Seattle International Gateway and the UP's Argo Yard. Both facilities are located less than two miles from Terminals 5 and 18 and directly across from Terminals 46 and 30. Both yards have direct access to the mainlines for each railroad.

Mainline Domestic Intermodal Terminals

In addition to the on-dock international intermodals yards, both BNSF and UP have intermodal yards in the Puget Sound that cater to domestic intermodal cargo. This is cargo that is in larger domestic containers, which are usually a 53-foot box that mirrors the domestic trucks used by the large retailers, such as Safeway, Target, or Wal-Mart. Due to the length of the domestic container, this type of train requires dedicated rail cars that will hold these longer boxes.

Exhibit 5-7: Seattle Freight Network

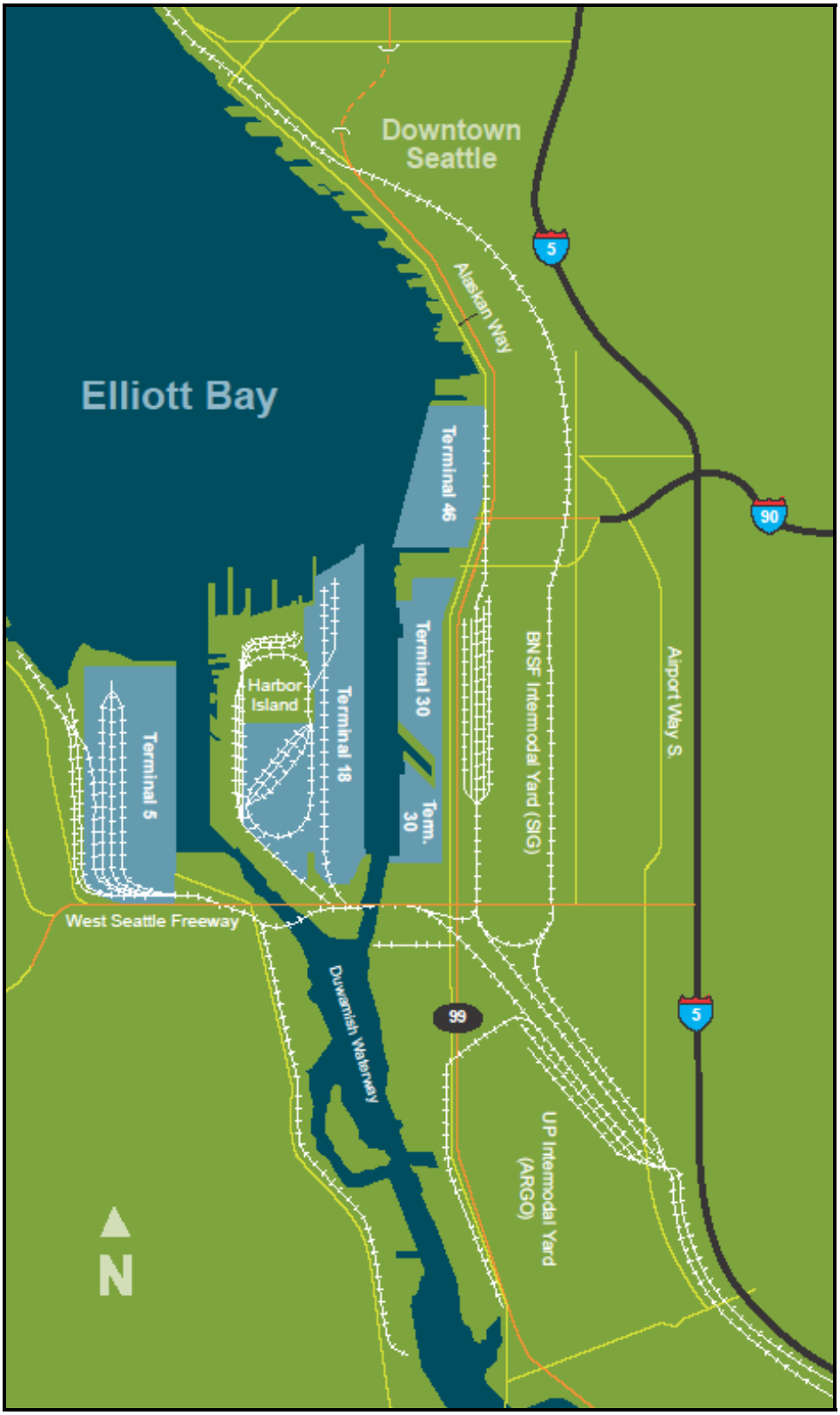


Exhibit 5-8: Tacoma Freight Network



BNSF has their South Seattle yard located near the south end of Boeing field.

UP loads domestic containers at both their Seattle Agro facility and their new Domestic Yard in Tacoma, co-located in the South Intermodal Yard.

Intermodal Connections

There are other types of intermodal connectors such as rail-to-barge, truck-to-grain elevators, rail-to-bus, as well as airports. In most cases airports are not supported by rail, although for freight there is the truck-to-

plane intermodal connector. Exhibit 5-9 shows all intermodal connections in Washington State. Exhibit 5-10 shows intermodal facilities in the Puget Sound area. Exhibit 5-11 shows intermodal facilities that include the rail mode. Appendix 3-C provides a detailed commodity description for these intermodal facilities.

Many smaller-size intermodal facilities are not included in BST's database. But, these intermodal facilities are important to the state's economy and should be identified. A study is needed to expand the database to include all intermodal connections.

Rail Freight System Issues and Needs

Mainline Freight Issues

Capacity/Bottlenecks

The benefits that the state can obtain from a robust rail system are threatened because the system is nearing capacity. Service quality is strained and rail rates are going up for many state businesses. The examples of rail lines that are currently running at capacity or near capacity are discussed in Chapter 3.

The pressure on the rail system will increase in the next decades. To accommodate this growth, many more rail lines within the state will be operating at or above their practical capacity.

Growth in rail traffic and rail congestion issues are also affecting state communities by increasing delays for automobile and truck drivers at rail-highway crossings, creating noise[6] and safety problems, and disrupting communities and environmentally sensitive areas with construction projects. Dealing with these problems in an uncoordinated fashion on a case-by-case basis is often frustrating for both the communities and the railroads.

[6] The Final Horn Rule was promulgated by the Federal Railroad Administration and published in the Federal Register on April 27, 2005. The rule required trains to sound a horn or whistle when approaching a highway railroad grade crossing. The intent was to develop a mechanism for a public authority to authorize a whistle/horn ban at a crossing(s) with the authority jurisdiction under the context of an existing state law or modified state law.

Exhibit 5-9: All Intermodal Freight Connectors in Washington State

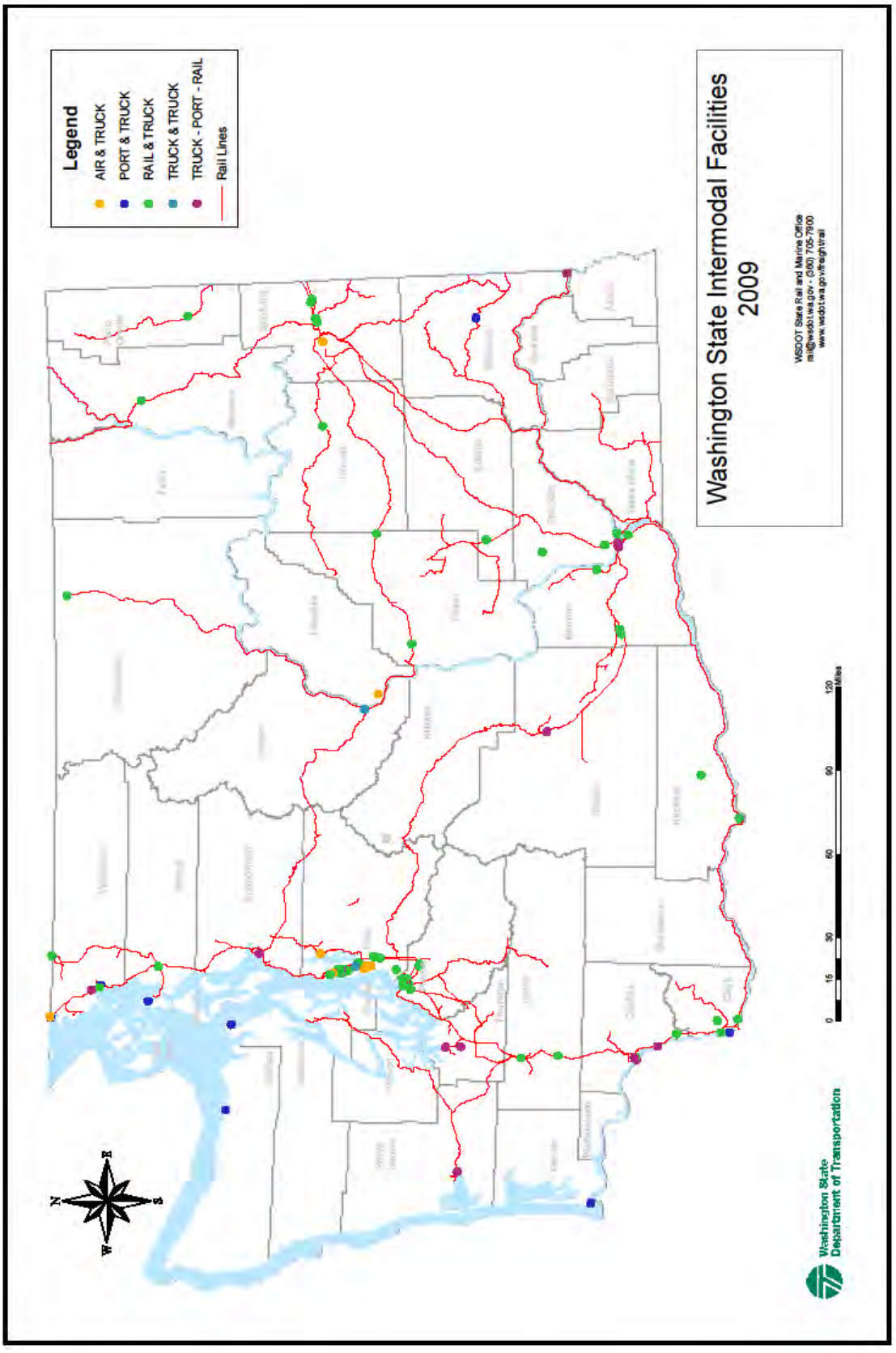


Exhibit 5-10: All Intermodal Freight Connectors in the Puget Sound Region

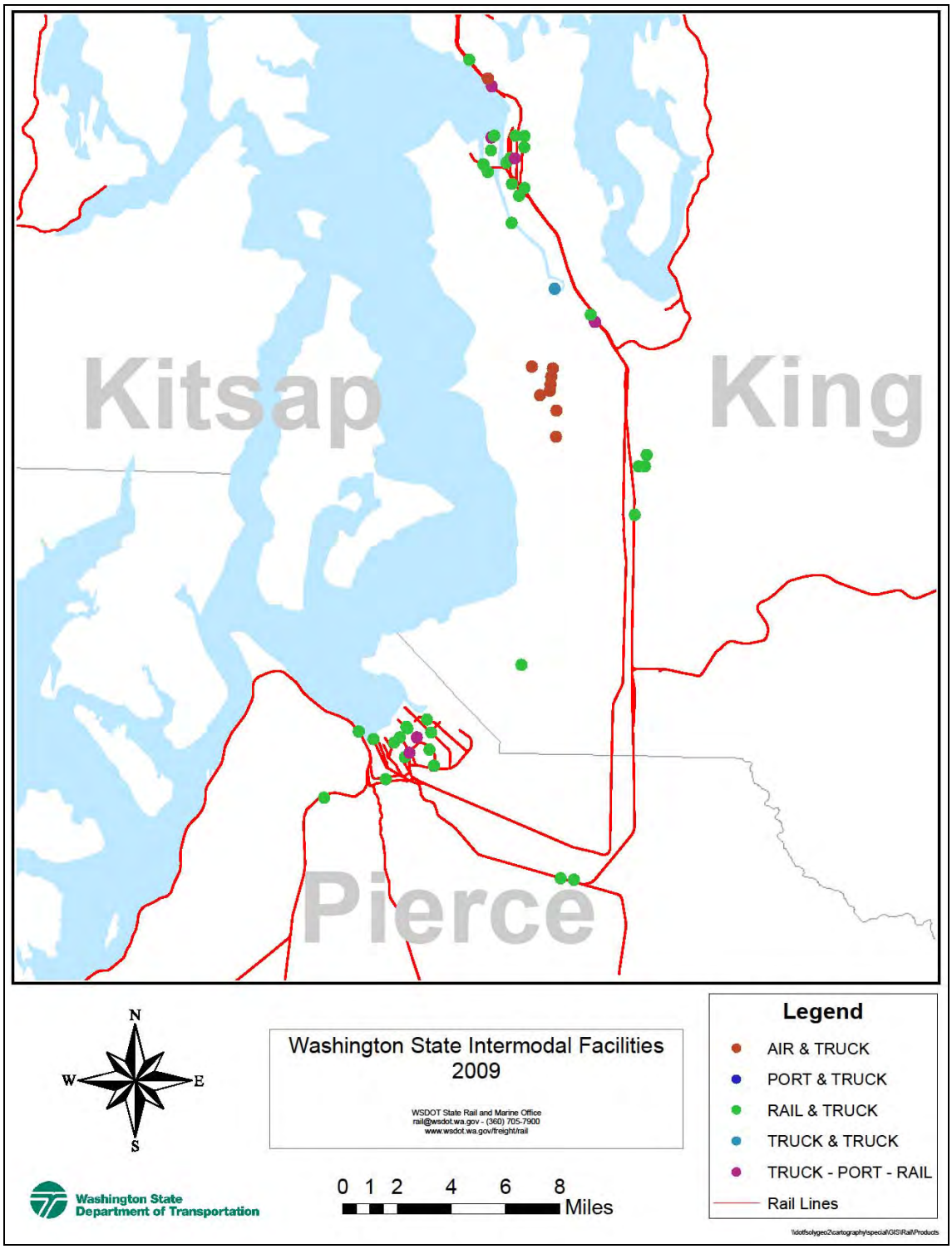
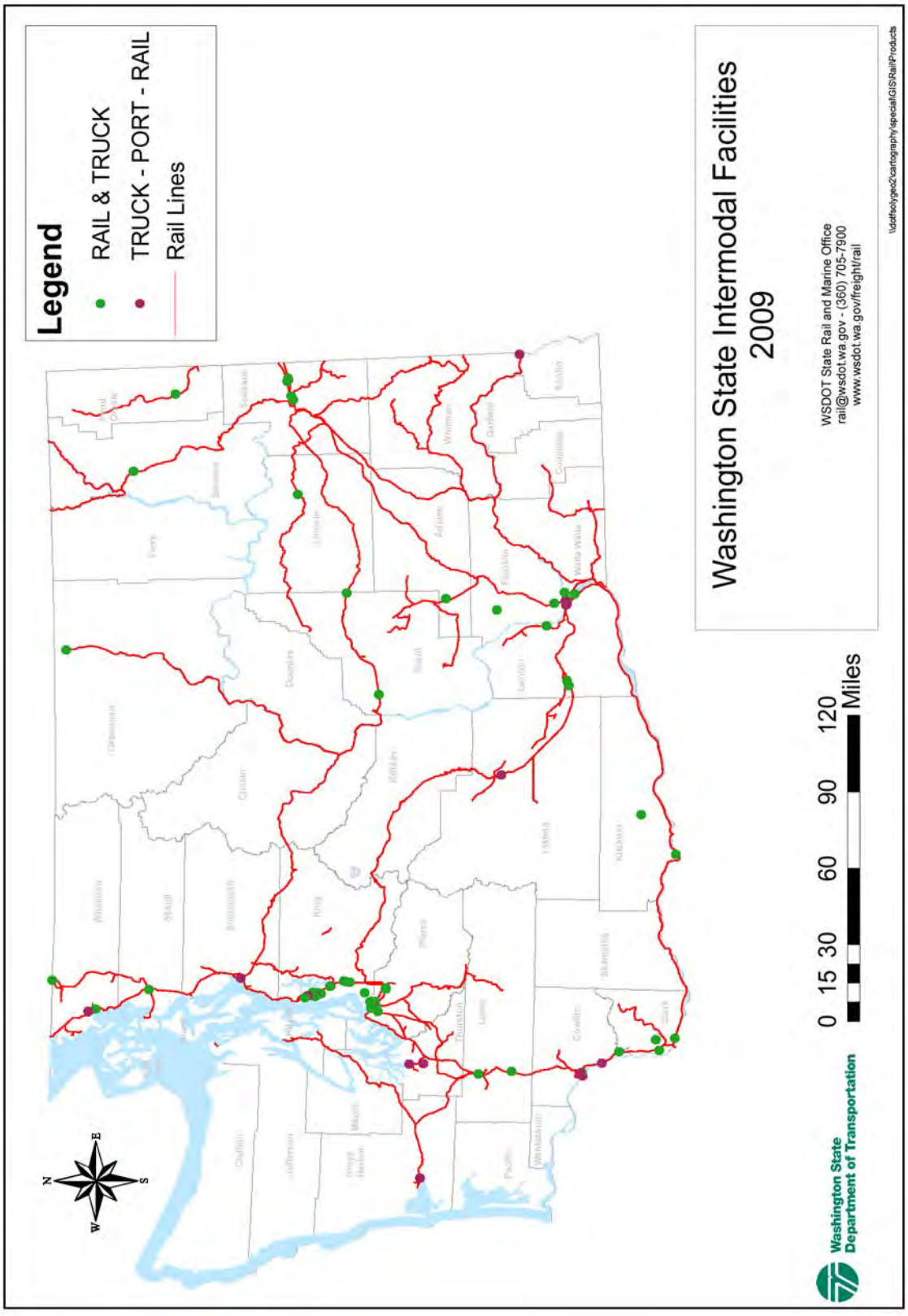


Exhibit 5-11: Rail Intermodal Freight Connectors in Washington State



Clearances

As referenced earlier in Chapter 3, the Stampede Pass route is limited to single-stack trains due to the clearance restrictions of that line, as it can not handle the height of double-stack trains. There are also height limitations caused by the Chuckanut tunnels on the I-5 rail corridor between Everett and Bellingham.

Freight and Passenger Mainline Issues

As freight and passenger trains compete for time and space on the rail system, the capacity constraints may also frustrate the service and ridership plans for the state's passenger rail program. The cost of resolving the rail chokepoints in the I-5 corridor to meet passenger service and ridership goals is increasing. WSDOT continues to look for funding solutions to these issues. Currently, WSDOT has $1.3 billion of grant applications into the federal government under the American Recovery and Reinvestment Act of 2009 (ARRA) programs. Current grant requests are described later in this chapter under High-Speed Passenger Rail in the Emerging Issues section.

Without capacity improvements, rail will not meet the demand of the state freight market, rail shipping prices will increase, and service reliability will deteriorate for many of the state's industrial and agricultural shippers.

Freight and Commuter Issues

Sound Transit provides *Sounder* commuter rail services in the Puget Sound region, with weekday peak-period service between Seattle and Tacoma and between Seattle and Everett. Both services operate over BNSF tracks.

The ongoing improvements at King Street Station in Seattle have contributed to more efficient combined freight and passenger operations between the Seattle Tunnel and Argo Interlocking. As with the Vancouver (WA) to Tacoma segment of the I-5 corridor, BNSF has no capacity expansion plans in its 5-year capital investment plan for this segment beyond that being driven by increases in intercity and commuter passenger growth plans.

Sound Transit and BNSF are currently in discussions to update the operating and volume agreement between Tacoma and King Street Station in Seattle. These discussions are focusing on an agreement similar to the one now in place between King Street Station and Everett. Under this scenario, Sound Transit would purchase additional train slots rather than paying for specific physical improvements. Assuming an agreement is reached, this arrangement would ultimately result in 15 round-trip

commuter trains per day between Seattle and Tacoma. In return, BNSF would be expected to construct the capacity improvements necessary to ensure that passenger and freight movements continue to operate efficiently. Ports are concerned that improvements are made in a timely manner, before the service starts, to avoid disrupting freight service when the additional commuter trips begin.

Short-Line Freight Issues

As regulatory changes allowed for Class I railroads to rationalize their networks by selling off unprofitable lines, more new enterprising, innovative, and customer-oriented rail companies emerged. Although some have failed, many more have lowered the cost structures of marginal, neglected rail lines and turned them into prosperous operations. Short lines now comprise 37 percent of the active rail network in the state in terms of operational miles.

However, the short-line railroads still have challenges. Some of these are capacity issues at interchange points with the Class I mainline and handling heavier weighted rail cars. In the case of the interchange the issue may only affect the short lines and may not impact Class I mainline capacity.

In general short lines have lower operating speeds and track conditions in comparison to Class I railroads. Further, it is clear that the need for capacity improvements are not limited to the Class I railroads. Prior to being sold to a short line, the "excess" sidings and yard tracks of a Class I-owned branch line were often removed to minimize maintenance costs and real property tax liabilities. Those actions made business sense under the regulatory and tax framework at the time. However, today, under the management of short-line operators, rail traffic has returned to these branch lines; the lack of runaround sidings, yard tracks, and interchange tracks can cause inefficient operations that increase the railroad's cost to serve shippers or can decrease safety.

Heavy-Axle Load Rail Cars

In the 1970s, many coal-originating railroads increased rail car weight limits for coal cars from 263,000 pounds to 286,000 pounds, as a result of heavier track structures being implemented at that time. In 1994 the Association of American Railroads (AAR) approved the same increase in weights for covered hopper cars. The latter change had a much bigger impact because covered hopper cars circulate throughout the North American rail system, hauling a variety of commodities on Class I railroads, as well as on short-line railroads.

A lengthy and costly effort was undertaken by the Class I railroads and some of the short lines to upgrade their lines to carry the heavier cars. However, track and bridge structures of many of the short lines are still incompatible with the interline standard of 286,000 pounds. Unfortunately, these are the railroads that are the least able to afford the high cost of upgrading their tracks to this standard.

Most recently, the Class I railroads across the nation are now carrying some 315,000-pound cars on main routes that have been certified for this new weighted car. Again, it is unlikely that short lines will be able to afford to upgrade their track to handle such cars in the near future. Even if they are able to upgrade the capacity of the track, it is unlikely that the bridges will be upgraded to this new standard. Thus, this incompatibility has forced bulk cargo either into less efficient cars or on to the highways.

System Preservation

Many of the short-line railroads are owned by private operators, making information on system conditions difficult to compile. Indications are that short-line rail tracks are facing large rehabilitation needs, and may be at least partly unfunded. Worsening track conditions could lead to further abandonment.

There is a no more fundamental transportation capital investment than system preservation to keep the physical infrastructure in good condition.[7] As transportation facilities age and are used, a regular schedule of rehabilitation, reconstruction, and replacement is needed to keep the system usable. Timing is important: if preservation investment is deferred, costs increase dramatically, leading to the saying "Pay me now, or pay me more—significantly more—later."

"Asset management" is a term that describes a proactive approach to investing in preservation at the right time to optimize rail condition. Asset management includes having comprehensive inventories of transportation facilities; a system for measuring and reporting system condition; predictive condition models that anticipate rehabilitation or replacement needs; and an investment program that ensures that the right investments are made at the right time.

In 2002 and 2003, the legislature reinforced this state's commitment to asset management. Legislation specifically required maintenance and preservation to be included in state plans for highways, ferries, and rail, and required cities, counties, and transit agencies to manage and report system condition. These requirements will help ensure that more

[7] Good condition is defined as not needing repair or maintenance.

consistent condition information will exist in the future about all transportation assets.

This chapter later discusses information needs in more detail; however the list below is an example of needed data and analysis related to abandonments and short-line railroad development.

1. **Abandonment** – What service area did these lines serve? Have they been banked or converted?
2. **Inventory** – What are the current short-line facilities and conditions?
3. **Assessment** – What is the short-line economic impact to the state? What is the short-line economic impact of the preservation or abandonment?

Underserved Markets (Grain Trains and Produce Cars)

Grain Trains

In the early 1990s, a national shortage of rail covered hopper cars made it difficult and expensive for state farmers to get grain to market. To help alleviate this shortage of grain cars, the Washington State Energy Office and WSDOT used federal funds to purchase 29 used grain cars in 1994 to carry wheat and barley from loading facilities in eastern Washington to export facilities in western Washington and Oregon. The Washington Grain Train currently has 89 grain cars in the fleet (71 are owned by the state, and 18 are owned by the Port of Walla Walla). The UP, BNSF, and state short-line railroads operate the cars and carry the grain to market. WSDOT is currently in the process of purchasing an additional 29 cars mandated by the state legislature.

Serving over 2,500 cooperative members and farmers in one of the most productive grain-growing regions in the world, the Washington Grain Train helps carry thousands of tons of grain to deep-water ports along the Columbia River and Puget Sound for transport to ships bound for Pacific Rim markets.

The Washington Grain Train produces a number of important public benefits, including:

- Helps move state products reliably and efficiently to domestic and international markets.
- Helps preserve the state's short-line railroads by generating revenues that may be used to upgrade rail lines and support the railroad's long-term infrastructure needs.
- Helps support a healthy rail network that may maintain and attract new businesses in rural areas of the state.

- Saves fuel over shipping by truck.
- Supports air quality improvement initiatives.
- Helps reduce wear and tear on local roadways by using rail.
- Supports the users by using equipment not subject to market based premiums.

The Washington Grain Train was started with federal "seed" money and operates without any taxpayer subsidy. WSDOT, the Port of Walla Walla, the Port of Moses Lake, and the Port of Whitman County all manage the Washington Grain Trains. WSDOT oversees the entire program, and the port districts collect monthly payments from the railroads for the use of the cars. The ports can use up to one percent of the payments they receive from the railroads for fleet management services.

The Washington Grain Train collects wheat and barley from grain elevators in eight cities in eastern Washington. These are: Warden, Schrag, La Crosse, Prescott, Endicott, Willada, St. John, and Thornton. The grain is transported to export facilities in Kalama, Tacoma, Seattle, Vancouver (WA), and Portland, Oregon.

Since its beginning, the Washington Grain Train program has carried over 9,000 carloads totaling more than 900,000 tons of grain from the state to national and international markets. Total carloads for the second quarter of 2009 increased 5.4 percent over the second quarter of 2008. There were 412 carloads shipped in the second quarter of 2009, compared with 391 in the second quarter of 2008. In 2008, a total 1,332 carloads were shipped compared to 1,822 carloads in 2007.

Produce Cars

In 2003 the state legislature enacted legislation (RCW 47.76.400) that authorized WSDOT to established a pool of refrigerated railcars to transport perishable agricultural goods. This legislation was in response to the state's agricultural community's inability to secure an adequate supply of refrigerated railcars during peak seasons from the railroads.

WSDOT started operation of the Washington State Produce Rail Car Program in 2006. Federal fund appropriations of $2 million and $200,000 from the state for startup operations and contract monitoring enable the railcar pool program to start.

On August 18, 2006, WSDOT signed a contract with Rail Logistics, LC to lease up to 50 refrigerated railcars and to manage the fleet. This contract was renewed in June 2009 for two additional years. The program is intended to provide the opportunity to open new markets for Washington State produce while maintaining economic viability for Washington's

agricultural community. The public benefit is that these rail cars minimize the added wear and tear on state roadways caused each year by thousands of heavy truckloads.

New Services

In October 2007, the partnership of UP, RailEx, and CSX Transportation initiated a new twice weekly unit train service carrying perishables (fresh fruit and vegetables) from Wallula, WA to Schenectady, New York. The cross-country trip takes 128 hours, a time that is very competitive with an over-the-road truck.

The 55-car train has next generation refrigerated boxcars that have the most efficient insulation, uses an environmentally-friendly and energy-efficient refrigeration unit, and has a global positioning system to monitor the "health" of the refrigeration unit and the temperature in the car.

Each train carries about the same amount of produce and perishable items that would have been moved by more than 200 over-the-road trucks. With the produce moving by rail instead of truck, 100,000 fewer gallons of diesel fuel are used each time the produce unit train operates.

Emerging Issues

Following is a discussion of four major emerging issue categories:

- Freight Rail Capacity and Competition.
- Positive Train Control Implementation.
- Impacts of Dam Breaching or Loss of Columbia-Snake Inland Waterway System.
- Statewide Information and Data Needs.

Freight Rail Capacity and Competition

Challenges that the state faces to achieve continued economic growth include:

- Increased rail competition for the Pacific Northwest (PNW) from other regions in the U.S. and Canada.
- East-west rail capacity issues.
- PNW ports serve discretionary traffic that can easily move to another gateway.
- Panama Canal expansion.
- Increasing competition from Pacific Southwest and Canadian Ports.
- Highway congestion.
- Restoration of Puget Sound.

On a per ton basis, trucking uses over 10 times more energy on average to transport freight than rail transportation. However, the average truck carries just less than six tons of freight, while the average rail car carries a load of 46 tons, reflecting the heavier, bulky commodities that railroads generally haul. Thus, when comparing energy intensity on a per-vehicle-mile or per-car-mile basis, the difference between the two modes is significantly reduced. It should be noted that rail is still less energy intensive.

The *National Rail Freight Infrastructure Capacity and Investment Study*, performed by AAR, assumes the Class I railroads will be able to generate approximately $96 billion of the $135 billion cumulative in the 28-year investment indentified through increased earnings from revenue growth, higher freight volumes, and productivity improvements. This would leave a national gap of approximately $39 billion or $1.4 billion per year to be funded from other sources in order to achieve performance improvements, while meeting the demand of the current rail market for freight shipments.

BNSF's capacity investment plan for the state over the next five years does not include any significant expenditure due to the current reduction of traffic volumes other than participation in siding extensions at Mount Vernon and Stanwood, and construction of a new customs inspection siding at Swift (Blaine) between Everett and the Canadian border.

In the meantime, competition from other ports on the west coast of North America continues to grow. Ports in southern California continue to attract a large portion of the West Coast international trade due to the huge local market they serve, and Oakland, while often considered less of a competitive threat, has continued to develop new properties as they have become available, and has seen growth in its international trade.

Of special importance for state ports, however, is competition from the Canadian ports of Vancouver, British Columbia (B.C.) and Prince Rupert; substantial investments are being made at both of these ports in order to improve their competitive positioning. Port Metro Vancouver (PMV), in particular, is developing ambitious plans for container facilities that could increase capacity by a factor of four over the next dozen years. The Port of Prince Rupert (PPR) also has ambitious plans to increase container throughput four-fold over the foreseeable future.

Both PMV and PPR have and are receiving significant support from the federal and provincial governments for their efforts to expand and improve freight mobility. That support will potentially involve government investment exceeding $1 billion (Canadian) for projects currently identified and under consideration. In addition, at least in

PMV's case, the ports have taken a proactive role in moving a variety of freight mobility projects forward.

The widening of the Panama Canal also provides shippers improved alternative routes to U.S. midwestern and eastern destinations. It is currently unknown the actual impacts that this expansion will have on state ports. There are numerous studies available on the subject without a consistent conclusion on the effects on the West Coast ports. There are many criteria that will be evaluated in a shipper's decision to use or not route their cargo through the expanded canal. Some of these include time to destination, fully loaded cost of the transport, customer service of the transportation vendors, etc. The newer, larger, more efficient ships will be able to use the expanded canal. Passage through the Panama Canal is currently limited to Panamax ships, which are no wider than 106 feet.[8] The challenge for the shipper is that although the larger ships can transit the canal, port facilities that are capable of berthing these larger ships are limited in number. Many West Coast ports are capable of handling these larger ships, but many of the gulf and East Coast ports have depth or height limitations at their ports that may prevent these larger ships from berthing. Various ports are in the process of making improvements in order to handle the larger ships.

The recent economic downturn has resulted in both Class I railroads serving the state (BNSF and UP) to reduce planned 2009 capital expenditures by $100 to $200 million in pure capacity expansion projects. This brings concerns that the Class I railroads could delay capacity enhancements in an attempt to control capacity, which could affect the competitiveness of the state as compared to other states. The capacity expansion projects that remain are those where previous commitments have been made including BNSF's intended improvements on the "Transcon" between southern California and Chicago (Abo Canyon double-track) and UP intended double-tracking on the "Sunset Route" between southern California and El Paso, Texas.

The positive side is that both BNSF and UP plan on continuing to invest in maintenance of existing track and purchase of locomotives—both are key components in maintaining capacity capability over existing track infrastructure. This capital investment, with a view to the long term, provides a good example of the path that the state should pursue in funding rail improvements, especially for those projects where the long-term interests of the state are clearly identifiable and the project timelines are long.

[8] A Panamax ship is no larger than a ship that can carry the equivalent of 3000 Twenty foot Equivalent Units (TEU). A TEU is a measure used in the marine industry to measure a container into equivalent units of 20 feet long, 8 feet wide, and 8 feet high.

For the state to stay competitive, a strong coalition must be developed among the stakeholders. This coalition must develop an integrated plan to develop the needed capacity to retain the state's rail freight market share. In this chapter the needs as well as risks have been identified. It will be detrimental to this state if a cohesive rail network is not maintained.

Some suggest that a High-Capacity Freight Corridor be developed. This High-Capacity Freight Corridor has been referenced by some stakeholders as the Northern Corridor and by others as the Hi-C. These two concepts have slight variations, but are built on the same assumption concept that a high-capacity rail corridor must be maintained and improved upon from the Puget Sound to Chicago, Illinois. This is not currently supported by either BNSF or UP. Perhaps the designation as a Corridor of National Significance will meet the goal. No matter which name or design is chosen, a national cohesive effort needs to be developed by both the public and private partners in order to achieve the economic growth that benefits the state's competitive position. The corridor will require infrastructure and operational improvements as well as cooperation between the BNSF and UP. An agreement on the priorities would need to occur and a funding program developed. Below is a selection of highly visible projects that need to be considered as the competitive strategy is developed.

Class I Railroad Competition

It is important to the state's economy to have healthy railroads competing for business in the state. This competitive environment will influence how aggressive is the rate structure offered and the level of investments the Class I railroads are willing to make within the state to increase their network capacity.

BNSF and UP capital investment decisions and strategies are based upon capacity needs and positioning their network to be more attractive to the customer. Class I railroads normally spend approximately half of their annual budgets for maintenance of their physical network (e.g., rail, ties, ballast, bridges, etc.). With capital expenditures for UP and BNSF amounting to $3 billion per year over the last few years, a significant portion of both railways' capital expenditures has been for maintenance of existing track. This expenditure is very important to the efficiency of the system since deferred or reduced maintenance can result in lower throughput on deteriorating track.

Similarly, BNSF and UP continue to make significant investments in locomotives. Trains that are under-powered often cannot maintain the maximum allowable speed, consuming more capacity than trains that have

sufficient power to maintain track speed. Both railroads continue to purchase locomotives that are much cleaner in emissions and more fuel efficient than older generations of locomotives. For instance, the required use of "green" locomotives in the Los Angeles Basin has caused the railroads to replace older locomotives with the newer more environmentally-friendly engines. In addition to locomotives, capital expenditures for new or improved signal systems on existing networks also enhance the capacity of a segment of track.

Both BNSF and UP allocate 10 percent to 12 percent of annual capital spending to expansion of their physical networks. This normally amounts to capacity expansion expenditures between $200 and $300 million spread across their respective 30,000 plus mile systems; though this expenditure accelerated somewhat in the period from 2005 to 2007. The emphasis of both railways was in constructing double track on the single-track segments for their respective mainline routes into and out of southern California. For example, BNSF's project to construct the 3rd main track over Cajon Pass was a project that took four years to complete at a total cost of approximately $90 million. The new mainline is 16 miles long and is projected to increase total train capacity by 50 trains per day to approximately 150 trains per day.

In addition to physical capacity expansion projects—such as constructing new main track, building new meet/pass sidings, and extending sidings—capacity expansion dollars are also used for expanding or constructing new yard and intermodal facilities. Consequently, competition for expansion capital is intense each year and the railroads normally focus those expenditures in locations they consider to be competitively sensitive or have the highest return on investment.

To focus BNSF and UP on the state's rail needs, the following things must happen:

- The state's economy must be growing.
- State ports must be efficient.
- Stakeholders must demonstrate their understanding of how important the rail system is to both the economy and ports.
- Rail operator's business needs must be acknowledged.

Another issue is the potential for Canadian National (CN) and Canadian Pacific (CP) to gain access to the state through either their current agreements with the BNSF and UP or through future agreements. This would again change the competitive landscape of the PNW. Depending on the agreement, this may be very positive or very detrimental to the state's ports and their competitiveness compared to other ports.

Finally, there must be consensus on what are the priority projects and the funding mechanism to get the improvements built.

East-West Issues

Northern Corridor/Northern Tier/High-Capacity Freight Rail Corridor

It is important for the economic growth of this state to have efficient, well-connected east-west rail corridors leading to other population centers in the U.S., especially the Midwest and upper northeast regions. As has been noted in Chapter 4, the state is dependent on freight movements in and out of the state to other mega regions where the goods are consumed or produced. The concept of the Northern Corridor is built upon the current routes of the Class I railroads along the Northern Tier from Washington to Illinois. This corridor links the two economic regions of the Pacific Northwest and the Great Lakes. Unfortunately, there are limited numbers of markets between Spokane and Minneapolis-St. Paul. Thus, the majority of the container trains leaving the state are direct trains with their first destination as St. Paul, before moving on to the Chicago area, where the train is either unloaded or switched to an eastern railroad for movement to the eastern or southern populated regions of the U.S. This route handles a magnitude of cargo types, such as intermodal containers, automobiles, agricultural products, and bulk commodities, such as minerals and coal. This corridor is of national significance and needs to be designated as such; and is essential to the competitiveness of the state's ports and other industries that drive economic growth within the state. It competes with six other transcontinental corridors extending from the Pacific to the East Coast.

The importance of the Northern Corridor should be recognized as one that connects Asian and North American markets together. This corridor competes with the central and southern U.S. rail corridors. In addition, the Canadian, Mexican, and Panamanian corridors provide effective alternatives for transportation of goods to all U.S. markets.

To achieve this, a coordinated approach between the corridor states and the private sector is needed to ensure that this corridor gets the same attention and funding as other parallel corridors. The obvious partners in the Northern Corridor include the states of Washington, Oregon, Idaho, Montana, North Dakota, South Dakota, Wyoming, Minnesota, Wisconsin, Indiana, and Illinois. This is the broad band of states that encompass the I-90 and I-95 highway corridors. The improvements in this corridor must

include the improvements required at the eastern end of this corridor, primarily Chicago and the CREATE[9] project.

While this corridor has experienced satisfactory maintenance and modernization, no large scale capacity improvements are currently scheduled, unlike competing corridors in the Southwest.

Regardless of the method chosen to improve capacity, there have been three barriers that are addressed in Chapter 8: identifying funding sources, developing participation across the states within the corridor from all stakeholders, and reaching agreement with the private owners of the rail infrastructure (i.e. the mainline railroads) on the priority of necessary improvements. Federal, tribal, state, local, and port governments all have a stake in the successful operations of railroads in the Northern Corridor.

Potential railroad benefits of the high-capacity freight corridor are:

- Increase east-west train capacity.
- Improve crew utilization/reduces labor costs.
- Improve fuel savings and locomotive use.
- Improve mainline train velocity across the state.
- Allow increase in train length for intermodal trains in the eastward direction from 7,000 feet to 8,000 feet without distributive power.

Potential public benefits are:

- Provide east-west rail capacity needed for port growth enabling a strong local economy.
- Mitigate for increased train traffic.
- Bypass major eastern Washington cities.
- Tie into the WSDOT-owned short lines in eastern Washington.
- Provide short-haul capacity to eastern Washington growers.
- Remove trucks from I-90.
- Spur economic development in eastern Washington.
- Improve air quality through reduced emissions.
- Improve national security.

WSDOT State Rail and Marine Office should lead the organization of the corridor coalition to make sure the development of the coalition and corridor meet the needs of the state and its stakeholders. The partnership should be formed and the cost and benefits analyzed. The following must be determined:

[9] CREATE stands for Chicago Region Environmental and Transportation Efficiency Program. This is a $1.5 billion project to improve freight rail connections in and around Chicago, Illinois.

- What is considered a public benefit to be funded by public funds?
- Which improvements are private and need private funding?

Once the coalition is organized these neighboring states can develop a joint plan to encourage and facilitate more service to the shippers along the Northern Tier.

Stampede Pass Clearance and Signal Systems

In the *Washington Public Ports Association (WPPA) Rail Capacity Study – 2004*, an analysis was performed on two scenarios that involved rerouting of traffic from Stevens Pass to Stampede Pass. The first anticipated the "clearing" of the Stampede Pass tunnels for double-stack rail cars in order to relieve capacity pressure on Stevens Pass.[10] The second analysis involved directional running of trains between Spokane and the Puget Sound, with westbound trains operating via Stevens Pass and eastbound trains operating via Stampede Pass.[11] 'Clearing" the Stampede Pass tunnel will significantly increase the capacity over Stevens Pass. But, BNSF has no capital investment allocated for clearing the tunnel in its current 5-year plan.

The issue of directional running is more problematic. This is an operational consideration for the private entities and cannot be enforced by the state. Directional running requires a one-way westbound route and a separate one-way eastbound route. Because of the grade issues on the two passes, it is thought that Stevens Pass would be the westbound route and Stampede Pass would be the eastbound direction. The re-routing of trains eastbound over Stampede Pass would add 82 miles to the trip. The longer distance and the lower speed per mile on the Stevens Pass route to Spokane require an additional crew shift to be added. The additional crew is due to labor rules restricting the number of hours a crew can work. This extra labor cost is in addition to other operational issues this route presents. Re-opening the Ellensburg to Lind cut-off would reduce the number of miles traveled since it would eliminate the need to go through Pasco. It could also alleviate some of these operational issues. However, the timing of these improvements is subject to various long-term issues that can't be forecast with any sense of confidence. The more significant questions, from a capacity demand perspective, are when will growth frequently stress the capacity on Stevens Pass and how will BNSF address the issue.

[10] Clearing refers to the crowning of a tunnel to allow taller rail cars to pass through or "clear" under the ceiling of the tunnel.

[11] Directional running is the concept that trains are routed only one direction on a corridor so that operational capacity is increased due to the fact that all trains move in the same direction not unlike a one-way street.

Both the *WPPA Rail Capacity Study – 2004* and the *Statewide Rail Capacity and Systems Needs Study* (2006) projected that as daily capacity demand on Stevens Pass reached daily sustainable capacity, overflow BNSF trains would be rerouted to or from the Puget Sound, either via Stampede Pass or the I-5 corridor to Vancouver (WA) and the Columbia River Gorge route.

Finally, additional capacity may be achieved if some bulk trains can be rerouted over Stampede Pass versus their current routing along the Columbia River Gorge. Currently testing is underway using mid-train helpers to enable heavy trains to climb steep grades. Should the distributed power (i.e. mid-train helper[12]) test prove to be productive, BNSF will have the ability to allocate additional trains to Stampede Pass that would otherwise operate via the Columbia River Gorge between Pasco and Vancouver (WA).

Bridging the Valley (Spokane to Athol)

A series of rail and road improvements jointly referred to as the "Bridging the Valley" project, have been planned between Spokane, WA and Athol, Idaho to separate vehicle traffic from train traffic. Where there are currently 75 railroad/roadway crossings, this project will construct approximately 19 grade-separated crossings within the BNSF corridor. The UP mainline will be relocated to an alignment within BNSF's mainline corridor to eliminate all mainline at-grade crossings on the UP line between Spokane and Athol, Idaho. However, the BNSF has indicated that capacity on this segment is sufficient. BNSF supports the grade separations envisioned, but does not support the relocation of UP onto the BNSF line. The railroad currently sees no value in participating in the project due to the fact that conjoining the two railroads on one line could damage the BNSF franchise significantly.

North-South Issues

North-South Corridor (I-5 Corridor Including Access to Canada)

As discussed in earlier chapters, the fluidity of the I-5 rail corridor is mandatory for the economic health of the state. This corridor can be classified as extending from Portland, Oregon to Vancouver, B.C. A north-south corridor supporting the east-west movement of cargo moving through the state is required to keep the rail network flowing. As the projections of cargo and passenger volumes are met, it will be especially important that attention is kept on the health of this north-south corridor.

[12] Distributed power or mid-train helpers are engines that are placed in the middle of the train. These additional engines help "power" a long or heavy train by distributing the load of the train between the front engines and those in the middle of the train.

Currently, BNSF has no public plans, other than those proposed to support intercity passenger train volumes, to increase capacity over the route. From a freight perspective, BNSF believes sufficient capacity exists for the foreseeable future. Indeed, BNSF sees nothing in this corridor as "freight driven." BNSF indicated it will construct additional capacity in the corridor only as driven by growth in passenger train volumes.

In the future, it will be very important to monitor the capacity and needs of this corridor and advocate capacity improvements to meet the growth projections. This will require coordination between all stakeholders and partners to assure the capacity is available for this corridor and its communities to meet their respective needs. This may require a true public-private partnership including regional agencies such as metropolitan planning organizations, Sound Transit, Amtrak, rail freight customers, ports, local communities, as well as other stakeholders. Public funding could include safety improvements, such as grade separations. Private railroad funding could include improvements, such as longer sidings or additional mainline tracks. One of the options to eliminate passenger freight conflicts and to enhance capacity for both is to create a dedicated high-speed passenger rail track.

In addition to the above improvements, BNSF recently constructed a 10,000-foot clear siding at Colebrook, B.C. Colebrook is located where the British Columbia Railway (BCRC)[13] Port Subdivision from Roberts Bank merges with BNSF's mainline to New Westminster and is approximately halfway between Swift and Brownsville. Prior to constructing the new Colebrook siding, BNSF had no meet/pass locations between the border and Brownsville.

Dedicated High-Speed Passenger Rail Track

This is an emerging issue in the United States as 11 high-speed rail corridors have been identified, with projects in various stages of development. One of the most ambitious, California's high-speed rail system, eventually will connect San Diego with San Francisco and Sacramento.

Here in Washington, the concept of dedicating tracks solely for high-speed passenger rail is under discussion. There are many differing opinions that are not fact based. Typically high-speed passenger rail is defined as trains that are capable of moving at a rate of speed between 150 to 180 mph. Currently our rail lines are limited to a maximum of 79 mph. As has been discussed in this plan, the I-5 rail corridor is currently shared with passenger rail (both commuter and intercity) through the state from

[13] BCRC is a class II regional railroad owned by the British Columbia provincial government until it was sold to CN in 2004.

Vancouver, WA to Vancouver, B.C. The potential speed differential burdens both freight and passenger operations.

Thus, the high-speed concept needs to be explored in more detail to determine the true pros and cons of a dedicated corridor. One of the advantages of the concept of freight rail is that freight could re-gain rail capacity on the I-5 corridor rail line if passenger rail has its own dedicated rail line in that corridor.

An example of separating freight from passenger within a corridor is the Pt. Defiance Bypass project. This project plans to separate passenger trains from freight trains by re-routing passenger trains to an inland route that runs parallel to the I-5 highway from Tacoma to DuPont. The line will be extended to reconnect with the BNSF mainline in Nisqually.

The improvements will allow passenger trains to use the bypass route without being delayed by freight trains. This will result in:

- Improved passenger rail reliability.
- Provide faster and more frequent Amtrak *Cascades* service. Speeds will be increased up to 79 mph.
- Allow increased freight rail service around Pt. Defiance and along southern Puget Sound by eliminating passenger trains from the BNSF mainline.

Eastside Line

BNSF is in the process of abandoning this corridor and the Port of Seattle has committed to acquiring it through the federal abandonment process and rail banking two of the lines. The future use of the corridor has been discussed among various groups in the region for many years.

The Eastside Rail Corridor consists of a 42-mile rail corridor stretching from the city of Renton to the city of Snohomish, with an 8-mile rail spur running between the cities of Woodinville and Redmond. The rail corridor passes through the cities of Newcastle, Renton, Bellevue, Kirkland, Woodinville, Maltby, Snohomish, and Redmond.

In fall 2003, BNSF indicated its intent to divest roughly 42 miles of railroad corridor in east King and south Snohomish Counties from its operational rail lines. BNSF asked if there was public interest in maintaining/preserving this extensive corridor for transportation purposes. The Puget Sound Regional Council (PSRC) took on the question of "public interest" and conducted a series of discussions with the eight jurisdictions along the corridor plus WSDOT, Sound Transit, and several of the regions' environmental/bicycling interests. The resulting

recommendation to preserve the corridor for future transportation uses was endorsed by PSRC's Executive Board, who unanimously agreed that this regional rail corridor should be preserved for future transportation uses and communicated this regional interest to BNSF in July 2004.

The final PSRC recommendations, completed in 2007, proposed transportation uses over different time periods such as short, medium, and long term. The findings include:

- This unique corridor should be preserved.
- It is not a strategic regional or state freight rail corridor.
- Freight rail access to Boeing's Renton plant needs to be preserved.
- Prior regional public transit studies in north-south Eastside Corridor need to be respected.
- "Medium-term" timeframe is needed to achieve long-term passenger rail objectives.
- The cost effectiveness of trail development should be optimized.

Port of Seattle is currently in the final acquisition stages to purchase this corridor. It is anticipated that this transaction will close by early 2010. The Eastside Corridor has two portions: the northern portion, between Snohomish and Woodinville, and the southern portion, which stretches from Woodinville to Renton and includes the Redmond spur. Under the terms of the acquisition agreement, BNSF agreed to select a third-party rail operator to maintain the operation. The operator will pay the Port of Seattle for the rights to use the land and will provide freight rail service for shippers in Snohomish County.

Positive Train Control Implementation

Both the BNSF and the UP face a new capital expenditure requirement as a result of the recent Federal Railroad Administration (FRA) and Congressional decision that mandates that Positive Train Control (PTC) be implemented on all mainline corridors that carry both freight and passenger trains. The legislation, passed in the wake of a head-on collision in California between a UP freight train and a Metrolink commuter train, requires the installation of PTC by the end of 2015. The legislation also requires that PTC be installed on all routes that handle certain hazardous materials.

As a practical matter, this means that the U.S. freight railways will be required to install PTC on virtually all mainline corridors. Nationwide, it has been estimated that implementation of PTC will cost billions. The capital requirements needed to meet the PTC mandate is likely to place further pressure on discretionary capital spending for capacity expansion

The major U.S. railroads, including BNSF, UP, CSX Corporation, Norfolk Southern, and Kansas City Southern, have been in various stages of testing PTC for a number of years. One of the significant issues the railroads have been dealing with is inter-operability, or the ability of the PTC systems of each railroad to communicate with another railroad's system when locomotives are operating on another railroad. As a result of the recent legislation, the railroads have initiated an effort to develop a system that will work across all of the railroads.

Impacts of Dam Breaching or Loss of the Columbia-Snake Inland Waterway System

Transportation System Impacts

The current Columbia-Snake Inland Waterway System is efficient for moving cargo. This system provides shippers with an alternative to shipping by rail, imposes price competition on the railroads, and supplies sufficient capacity to absorb substantial fluctuations in grain shipments, especially during peak export months and years. The major components of the existing barge transportation system include:

- Barge terminals and river elevators.
- Access roads to the barge terminals and river elevators.
- Navigation channel.
- Locks.
- Barge fleet.
- Export elevators.[14]

To complicate this issue is the fact that the waterway is owned and controlled by the Army Corp of Engineers.

Siltation has been problematic in the McNary Dam pool, which is the first Columbia River dam below the Snake River. If the Snake River dams were to be breached (removed), much of the grain (and other commodities) that is now barged on the Snake River could be expected to shift to loading or unloading facilities in the McNary Dam pool. Elimination of barge transportation on the lower Snake River will result in a less efficient system for moving freight.

In addition to the effect that dam breaching would have on the barge system, transportation impacts would also be shifted to the road and rail systems in the region. The mainline rail system, short-line rail system, and state and county road systems could all be expected to carry an increased share of the freight now shipped by barge. Depending on the

[14] Export elevators are elevators that can load export ships directly from the elevator.

closure all grain currently shipped by barge may be shifted to rail. This could cause capacity constraints to be reached.

The short-line rail system can also be expected to handle an increased volume of grain if the Snake River dams are breached. Unfortunately, the short-line railroads that currently operate in the grain-producing region of eastern Washington only generate enough revenue to cover operating costs, and are not generally able to finance capacity upgrades. Rail-served grain elevators may also require substantial capital improvements, if they are to handle the grain expected to shift from barge transportation. Many of these elevators have not been used for rail loading in years, and the condition of their equipment is unknown. Additionally, the rail sidings at many of these elevators are only long enough for three cars, while the current standard for sidings is a minimum of 25 or 26 cars.

The highway system will also face increased costs, due to shifting transportation patterns. Roads that were not designed and constructed to handle large volumes of truck traffic can be expected to face increased maintenance costs.

Other issues to be considered in this discussion are:

- The need for the eastern Washington producers to continue to move containerized commodities such as peas and lentils.
- The need to move products from the coast to eastern Washington that barges will not handle, such as fertilizers.
- The cost of long distance trucking as compared to either rail or barge.
- The transportation of products that do not have access to a waterway.
- Rail competitiveness as compared to barge and truck.

Rate Impacts

The fact that the region served by the Snake River barge system is also served by railroads means that neither mode of transportation is able to charge monopoly rates for service. Breaching the Snake River dams, however, would decrease competition and would likely lead to rate increases. According to the National Corn Growers Association, “it has been demonstrated numerous times that areas throughout the country that do not have access to barge transportation have higher rail rates.” The Tennessee Valley Authority examined the effect of barge transportation on rail rates on the upper Mississippi River, and concluded that “the continued availability of water transport appears to have a significant impact on the pricing behavior of other surface transportation modes—at least when these modes are reasonably close to the river. In particular,

there is a large body of economic literature, which suggests that available barge transportation effectively constrains railroad pricing for the transportation of commodities that are moved by barge. These barge-constrained rail prices have come to be called 'water-compelled' rates."

Statewide Information and Data Needs

The United States Department of Transportation (USDOT) and FRA are aware that statewide information and data is needed by the states in order to develop statewide rail plans. In these plans, the states set policies for freight and passenger rail transportation within their boundaries, establish priorities and implementation strategies that enhance rail service in the public interest, and serve as the basis for federal and state rail investments within the state. Currently, there is not enough data collected by the states or for the states in order for the analysis to be done to meet all of these expectations.

It is recognized that not only does the data need to be available but this data needs to be centralized into a designated office within state Departments of Transportation. The USDOT expects that these state rail plans will provide detailed insight into the concerns facing state transportation systems and set forth state visions of how rail transportation can address those issues. An element that the USDOT views as necessary includes multimodal transportation, especially ways in which modes can be integrated to serve transportation customers more effectively and efficiently.

States are in a unique position to provide information on local rail bottlenecks and resulting traffic congestion. Such information can affect the movement of goods and people, not only in that location but throughout the rest of the corridor as well. This lack of information can negatively affect the larger transportation network. Resolving such issues can improve transportation flows and positively affect the movement of goods and people far beyond state borders.

The current lack of a centralized point of data collection and retention limits the depth of the analysis that can occur on the system as a whole. As discussed throughout this plan, it is critical that the rail within the state and the nation be viewed as a total system and not individual ownerships or projects. Rail is one mode in the U.S. transportation system and it must be viewed as a part of the whole transportation system that must adequately and efficiently move both goods and people.

An example of the lack of critical information needed for decision makers is adequate data on short-line railroads within the state.

Short-line railroads (approximately 2,000 operating miles) are essential to the state economy, yet the state has virtually no physical condition information about these railroads. Most short-line railroads have no detailed condition inventory, while others have not updated their detailed condition inventory for many years.

A detailed, physical condition inventory of the state short-line railroad lines and facilities is needed to guide state investments for rail projects, specifically in the areas of project level analysis, infrastructure delivery planning, and decision making about rail infrastructure improvements. The condition inventory is estimated to cost between $1 million to $2 million, depending on level of detail and inclusivity required in the inventory.

A Statewide Rail Information Center Is Needed

A Statewide Rail Information Center would enable transportation planning and policy development to incorporate rail information to better support economic development and societal needs to address unexpected and disruptive events. A great deal of rail information and data exists at national, state, and regional levels. However, such data and information were not systematically organized and normalized to meet the needs of transportation planning and regional socioeconomic development.

The fact that rail information and data was not developed in a consistent way over time becomes a barrier for integrating rail information in transportation decision making. Gaps exist between availability of rail data and information and the needs for such data and information. This center would be able to develop needed data systematically and consistently to meet WSDOT's needs.

Regional economic planning organizations, transportation planning organizations, local communities, private industries, and information producers have a strong need for a statewide information center. This information center would assist these stakeholders to meet the challenges of systematically and consistently collecting, developing, and distributing freight information and data.

Summary

To retain the state's ability to compete in the complex world of goods movement, the state and its partners must position the state to provide efficient rail transportation. In order to accomplish this goal, the partners must work together to collect data that can be used to identify the chokepoints in the system. Those chokepoints must then be evaluated to determine their costs and benefits to both public and private stakeholders. A priority list must be developed based upon this analysis so that

policymakers can make educated decisions on the improvements that need to be funded and when. Working together the state can build an efficient rail network to support it citizens, businesses, and customers.

Washington State Department of Transportation

Chapter 6: State Roles and Partners

Washington State's Current Roles

Transportation planning is an ongoing collaborative process to develop a multimodal transportation system that:

- Supports sound transportation investment decisions as evidenced in the overall program and its elements.
- Supports economic vitality.
- Increases safety and security.
- Increases accessibility and mobility options.
- Protects the environment and improves quality of life.
- Enhances system integration and connectivity.
- Promotes efficient system management and operation.
- Emphasizes system preservation.[1]

"Moving Washington" articulates Washington State's (state) vision for transportation. The vision focuses on improving freight rail capacity, promoting public safety, maintaining economic viability, and enhancing environmental sustainability. State roles support this vision through varied legislative statutes.

Four groups within the state government have legislatively mandated roles and responsibilities for oversight, management, and implementation of the state's interest in passenger and freight rail. They are the Washington State Department of Transportation (WSDOT), the Freight Mobility Strategic Investment Board (FMSIB), the Utilities and Transportation Commission (UTC), and the Washington Community Economic Revitalization Board (CERB).

Washington State Department of Transportation

WSDOT is charged with planning, funding, implementing, constructing, and maintaining the multimodal transportation system in this state. As such, it is the conduit for state and federal transportation dollars. Freight and passenger rail programs are housed within the State Rail and Marine Office. See Chapter 1 for authorizing statutes.

WSDOT is the steward of a large and robust transportation system, and is responsible for ensuring that people and goods move safely and efficiently. In addition to building, maintaining, and operating the state

[1] WSDOT Planning Office, www.wsdot.wa.gov/planning/.

highway system, WSDOT is responsible for the state ferry system, and works in partnership with others to maintain and improve local roads, railroads, airports, multimodal transportation facilities, and promote programs that encourage citizens to use alternatives to driving alone.

WSDOT works towards supporting the following statewide transportation policy goals established by the state legislature for all public investments in transportation:

- Safety.
- Preservation.
- Mobility.
- Environmental quality.
- System stewardship.

State Rail Transportation Authority

WSDOT is the agency that oversees multimodal planning, including rail, at a statewide level. The WSDOT State Rail and Marine Office provides project management, oversight capacity, and editorial control over the *Washington State 2010-2030 Freight Rail Plan.*

State Rail Approval Authority

The WSDOT Secretary of Transportation is the state-designated approving authority for the *Washington State 2010-2030 Freight Rail Plan*.

State Freight Rail Plan Advisory Committee

The State Freight Rail Plan Advisory Committee serves as the external rail advisory body for the *Washington State 2010-2030 Freight Rail Plan.*

Internal Advisory Group

The WSDOT Strategic Planning and Programs Office coordinates statewide multimodal transportation planning, priorities, and issues, including programming and financial planning.

WSDOT State Rail and Marine Office

The State Rail and Marine Office, which is part of the WSDOT Freight Systems Division, has a strategic leadership role for freight rail investment that is essential to manage the state's freight and passenger rail capital programs and operations.

Strategic Planning

The State Rail and Marine Office coordinates with public and private sector partners to develop strategic rail plans, policies, and legislative proposals that guide strategic investment in freight rail transportation. The office conducts legislative-directed policy and legislation analyses and strategic investment assessments. It develops and uses benefit/cost tools that reflect legislative priorities and stakeholder interests to prioritize freight projects and evaluate funding requests. It also develops strategic plans, such as the *Washington State 2010-2030 Freight Rail Plan*.

Program and Project Management

The State Rail and Marine Office manages freight rail programs and projects (i.e. capital construction projects, Freight Rail Investment Bank, Freight Rail Assistance Program, Grain Train program, Produce Railcar program, and state-owned rail lines discussed in Chapters 3, 5, and 8) that promote the goals of the freight rail system. Some increase public safety by reducing at-grade crossings with high accident potential (WSDOT/FMSIB projects), while others enhance capacity or leverage federal funding sources that enhance economic viability to meet the needs of the overall state economy.

Statewide Freight Rail System Utilization Data and Information

The State Rail and Marine Office helps stakeholders build an understanding of the issues and think about the potential of freight rail as part of a strategic multimodal transportation system. The office conducts research and analyses for freight policies and legislations. It develops and provides statewide freight rail system utilization data and information that is essential for regional and local freight planning and operations. Examples include freight rail system databases, physical and condition inventories, maps, needs assessment analysis, capacity studies, commodity flow and socioeconomic impact analyses, and freight modeling to forecast future capacity and needs.

Public Outreach

The State Rail and Marine Office provides outreach consistent with state and federal policies to increase public awareness and to broaden the understanding of railroad system costs, benefits, and investments necessary to form a cohesive and efficient multimodal transportation network.

In the past 18 years, the State Rail and Marine Office has used its powers and authorities under Chapter 47.79 RCW (high-speed ground transportation), Chapter 47.76 RCW (rail freight service), and Chapter 47.06 RCW (statewide transportation planning) in the following ways:

- To develop the Amtrak *Cascades* service as part of its high-speed intercity rail program.
- To acquire and preserve rail lines and rights of way abandoned by Class I railroads (and other railroads).
- To provide assistance to short-line railroads to maintain service for shippers and receivers who do not have access to mainline rail service.
- To lease specialized railcars (e.g. hopper cars for the Washington Grain Train program, refrigerated cars for the Produce Rail Car program) to ensure an adequate pool of equipment for state growers.
- To develop Amtrak *Cascades* long-range and mid-range plans, and coordinate with other statewide planning efforts.
- To develop a benefit/cost methodology to evaluate projects for potential investment.

The State Rail and Marine Office is currently managing more than 50 capital rail projects that are proposed, funded, or underway, and support freight and passenger rail mobility in the state. When completed, these rail projects will result in improved freight mobility, improved safety, reduced rail congestion, upgraded tracks, and improved frequency of Amtrak *Cascades* passenger rail service.

The State Rail and Marine Office follows a rail improvement strategy for state participation that is consistent with the Washington State Constitution. There are a number of provisions in the constitution that limit the state's involvement in the private rail system. The guidelines outlined in Article VIII of the constitution, "State, County, and Municipal Indebtedness," limit the extent to which the state, counties, or cities can give or loan credit to corporations. The provisions of RCW 47.76.250 (essential rail assistance account - purposes) address this limitation by clarifying how a state may participate in projects with private ownership. This RCW also allows private entities that meet minimum eligibility criteria to receive grant funds, if contractual consideration is provided in return. At a minimum, such contractual consideration shall consist of defined benefits to the public with a value equal to or greater than the grant amount, and where the grant recipient provides the state a contingent interest adequate to ensure that such public benefits are realized.

Freight Mobility Strategic Investment Board

FMSIB was created by the Washington State Legislature in 1998 and is established as a rule-making board by RCW 47.06A.030. Its purpose is to administer projects and strategies that lessen the impacts of freight movement on local communities and facilitate efficient and profitable freight movement in the state. The 10-member board has representatives from state ports, railroads, cities, counties, WSDOT, the Governor's Office, truckers, marine operators, and private citizens. Periodically,

FMSIB issues a call for projects in order to maintain a 6-year list of active projects. FMSIB's past rail funding has primarily supported grade separation and crossing improvement projects.

Utilities and Transportation Commission

The UTC protects consumers by ensuring that utility and transportation services are fairly priced, available, reliable, and safe. The UTC is responsible for railroad safety under Title 81 RCW (transportation). The rail group is part of the UTC Safety and Consumer Protection Division, but separate from the Transportation Safety Group, which covers persons and property traveling on state roads. A primary responsibility of the rail group is to work with the Federal Railroad Administration (FRA) to inspect rail shipments of hazardous materials. There are more than 300 inspection points throughout the state, including shippers' facilities, railroad yards, and terminals.

Washington Community Economic Revitalization Board

CERB is a statutorily authorized state board. CERB is the state's strategic economic development resource, focused on creating and retaining jobs in partnership with local governments, and financing public infrastructure that encourages new development and expansion in targeted areas. It receives administrative support from the state Department of Commerce. It issues grants and loans that will retain existing jobs and create new ones, boosting business growth across the state. CERB can provide funding for rail projects that promote industrial development and has done so in the past. An example of this type of project was its $1,000,000 low-interest loan to the Port of Longview to help construct a second rail line and rail spurs serving a planned new facility for processing newly imported cars.[2]

Summary

Each of these groups within state government has knowledgeable staff that carries out its mandates effectively. However, the lack of a central point of contact and coordination makes it difficult for businesses, communities, and the railroads to work with the state. In some cases, it weakens the state's negotiating position.

The existing statutes, in Appendix 1-A, define the state interest in freight and passenger rail, assign roles and responsibilities for the oversight of the state's interest in rail, and establish a number of specific passenger and freight investment programs. The statutes provide a broad foundation for continued state participation in the preservation and improvement of the

[2] *Statewide Rail Capacity and System Needs Study, Final Rail Study Report*, Section 4.3, pp. 36-37, 2006.

rail transportation system, where there are public benefits to the state, its businesses, and its communities.

Washington's Strategic Partners

The state has a leadership role to encourage and build strong partnerships within the public and private sectors that ensures future economic competitiveness and viability among the railroads, ports, shippers, governments, communities, and other key stakeholders. Such partnerships are built on common interests, common understandings, and existing relationships. Appendix 6 contains a list of WSDOT freight partnerships. Some of these partners and partnerships are discussed below.

Freight Railroads

Freight railroads are business ventures. Their motivation to work with the state originates from the possibility of improved financial return. They increasingly recognize their important role in meeting public goals, such as improved air quality. Freight rail projects and policies that simultaneously boost a railroads' bottom line and advance the public interest may merit greater attention and resources from the state during the planning processes as railroads are more likely to reciprocate. Chapter 3 describes the state's railroads in more detail.

Ports

Ports are the only public agencies whose primary mission is to promote economic development, and the related businesses and jobs.[3] According to the Washington Public Ports Association (WPPA), there are 75 port districts in the state that were originally authorized in 1911 to provide maritime shipping facilities and rail/water transfer facilities. Since then, many additional authorities have been granted, such as building and operating airports (1941); establishing industrial development districts (1955); developing trade centers (1967); and developing economic development programs and promoting tourism (1980s). Ports provide the public a direct way to own and manage important community assets such as waterfront land and airport facilities. Chapter 5 describes the state's ports in more detail.

Shippers

Shippers are the public and private sector customers of the statewide rail system. They move a wide variety of goods, including raw materials, finished goods, and waste, from origin to destination, using rail and other modes of transportation. Top shippers are the manufacturers/industrial

[3] WPPA, Commissioner Resource Guide, www.washingtonports.org/downloads/commissionerresourceguide.pdf/.

carload shippers, the ports and international trade sector/intermodal container shippers, and the agricultural and foods products industry/bulk and specialized carload shippers.[4] Chapters 3 and 4 describe shipping demand and rail freight services in more detail.

Other Partners

Federal Railroad Administration

The FRA was created by the Department of Transportation Act of 1966 (49 United States Code 103, Section 3(e)(1)). The purpose of the FRA is to promulgate and enforce rail safety regulations; administer railroad assistance programs; conduct research and development in support of improved railroad safety and national rail transportation policy; provide for the rehabilitation of Northeast Corridor rail passenger service; and consolidate government support of rail transportation activities. Today, the FRA is one of ten agencies within the United States Department of Transportation (USDOT) concerned with intermodal transportation. It operates through seven divisions under the offices of the Administrator and Deputy Administrator.[5]

The federal government, through the Passenger Rail Investment and Improvement Act of 2008 (PRIIA), requires coordination of the state rail plan with state transportation planning goals and programs. It also requires coordination of rail transportation roles within the state transportation system. Under the "Intergovernmental Coordination" section of PRIIA, the state should also review freight and passenger service activities and initiatives with regional planning agencies, regional transportation authorities, and municipalities.

Regional Planning Organizations

There are two types of transportation planning organizations in the state with coordination and development roles for projects and programs by region. A Metropolitan Planning Organization (MPO) is comprised of elected officials in an urbanized region with 50,000 or more in population. MPOs provide a forum for local decision making on transportation issues of a regional nature. Under the Safe, Accountable, Flexible, and Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), the policy for the metropolitan planning process is to promote consistency between transportation improvements and state and local planned growth and economic development patterns.[6]

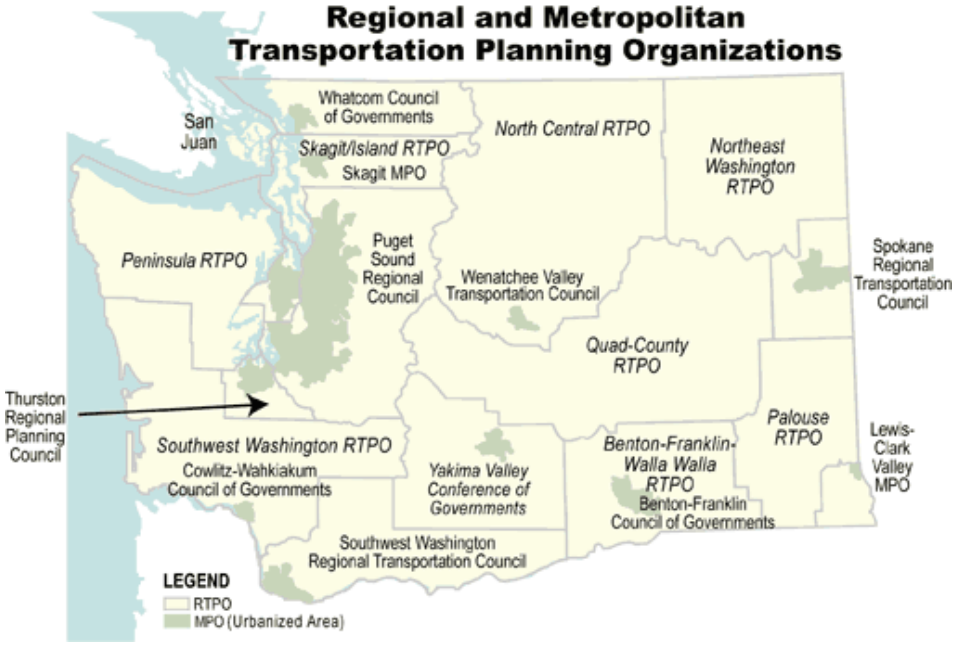
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[4] *Statewide Rail Capacity and System Need Study*, Tech Memo 10.1, Analytical Plan, pages 4-5, 2006.
[5] FRA, www.fra.dot.gov/.
[6] MPO, www.wsdot.wa.gov/planning/metro/.

A Regional Transportation Planning Organization (RTPO) is formed through a voluntary association of local governments within a county or contiguous counties. RTPO members include cities, counties, WSDOT, tribes, ports, transportation service providers, private employers, and others. RTPOs were authorized by the state as part of the 1990 Growth Management Act to ensure local and regional coordination of transportation plans.[7]

MPOs and RTPOs are organized by function into executive, boards, policy boards, and technical assistance committees with supporting staff. Exhibit 6-1 is a map of the MPO and RTPO coverage across the state.

Exhibit 6-1: Regional and Metropolitan Transportation Planning Organizations



The MPO/RTPO Coordinating Committee includes a representative from each MPO and RTPO. It also includes a representative of the Tribal Transportation Planning Organization (TTPO). The TTPO is an advisory committee comprised of designated transportation planners from each tribe along with state and federal government representatives. The TTPO serves in a technical assistance and advisory capacity for tribal, state, and federal governments.

[7] RTPO, www.wsdot.wa.gov/planning/Regional/.

Tribal Governments

WSDOT maintains government-to-government relations with 35 federally recognized tribal governments. Twenty-nine tribes are located in the state; the additional six tribes have reservations outside the state, but have traditional homelands, treaty rights, or other interests within the state. Tribes may have public and private interests in freight rail development through the community and economic development arms of their governments.

Many tribes, including Chehalis Confederated Tribes, Colville Confederated Tribes, Kalispel Tribe, Nisqually Indian Tribe, Puyallup Tribe, Squaxin Island Tribe, Swinomish Tribe, Tulalip Tribes, and Yakama Nation, have reservation lands that are on or near railroad main lines or spurs. WSDOT will work with tribes to develop any potential rail-related projects and develop a detailed map that shows tribal reservation boundaries in relation to rail access.

WSDOT is committed to working with tribes to build durable intergovernmental relationships that promote coordinated transportation partnerships in service to all citizens. The *WSDOT Centennial Accord Plan* was created in accordance with the *1989 Centennial Accord* and the *1999 Centennial Accord Implementation Guidelines*. The *Centennial Accord* mandated that each state agency must have a procedure to implement effective government-to-government relations. The *WSDOT Centennial Accord Plan* includes the WSDOT Secretary's Executive Order on Tribal Consultation, a Dispute Resolution Policy, and detailed descriptions of the programs, services, and funding available to tribes from key WSDOT divisions and offices.[8]

Public-Private Partners

With funding limited for any infrastructure project, future investments may require involvement in public-private partnerships. Public-private partnerships are defined as a cost-sharing method of funding a project between public and private entities based on expected benefits. They may use a combination of funding sources and may include an integration of tax exempt bond financing (when available), state and federal loan guarantees, grants, or contributions from the railroads, as well as dedicated funding sources. Public ports use public-private partnerships, for example, in their lease arrangements for joint development of a terminal or facility. Ports transfer the future services rendered by a fixed

[8] WSDOT *Centennial Accord Plan*, March 2009, www.wsdot.wa.gov/tribal/Centennial_Accord.htm/.

asset (e.g., a container crane or other terminal facility) to a private organization, while retaining the title to that fixed asset.[9]

Strategic Rail Corridor Network

The Railroads for National Defense (RND) Program ensures the readiness capability of the national railroad network to support defense deployment and peacetime needs. The RND Program, in conjunction with the FRA, established the Strategic Rail Corridor Network (STRACNET) to ensure that FRA minimum rail needs are identified and coordinated with appropriate transportation authorities. STRACNET is a nationwide, interconnected, and continuous rail line network serving defense installations. STRACNET works with the FRA and USDOT's Surface Transportation Board, state departments of transportation, American Association of Railroads, American Railway Engineering and Maintenance of Way Association, Railway Industrial Clearance Association, and individual railroad companies to protect this railroad infrastructure.[10]

West Coast Corridor Coalition

The West Coast Corridor Coalition (WCCC) is a partnership of state departments of transportation, regional and local transportation agencies, ports, and related transportation organizations (both public and private) from Alaska to California. The WCCC has begun to identify regional, system-wide issues and develop a foundation allowing the coalition and its members to address issues and chokepoints that cross jurisdictional interests and financial boundaries.[11]

Strategic Planning

The State Rail and Marine Office recently participated in an FRA meeting as part of the development of a preliminary national rail plan. The issues discussed were summarized in the *2009 Preliminary National Rail Plan* (below).[12]

- Collaboration and stakeholder agreements.**
- Implementation timeline and evaluation criteria.***
- Need for public education/outreach.*
- Livability issues.
- Interconnectivity.*
- Sustainable federal funding.**

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[9] *Statewide Rail Capacity and System Needs Study*, Tech Memo 6, p, 25, 2006.
[10] RND, www.tea.army.mil/DODProg/RND/default.htm/.
[11] *West Coast Corridor Coalition Trade and Transportation Study*, www.wsdot.wa.gov/NR/rdonlyres/5A019EA4-50EF-4286-96F9-05398B52608A/0/_DR1_WCCC_TradeandTransportationStudy_COMPLETEweb.pdf.
[12] *2009 Preliminary National Rail Plan*, page 32.

- Sustainable state funding.*
- National equipment standards.**
- Environmental processes.
- Positive Train Control.*

* Issue was briefly discussed at the Seattle meeting.
** Issue was raised multiple times/discussed in greater detail at the Seattle meeting.
*** Most prominent issue discussed at the Seattle meeting.

The *2009 Preliminary National Rail Plan* addresses the need to rebalance the transportation system by strategically aligning the state rail plans and the national rail plan. It requires states to provide key leadership in developing common understandings, aligning goals, and taking actions that further state and national policy goals.

PRIIA (PL 110-432, Division B, Section 303) contains a legislative mandate that directs the FRA to develop a long-range national rail plan consistent with state-approved plans. PRIIA requires states to establish or designate a state rail transportation authority. This authority is responsible for:

- Developing statewide rail plans and policies for freight and passenger rail transportation within their boundaries.
- Establishing priorities and implementing strategies that enhance rail service in the public interest.
- Serving as the basis for federal and state rail investments within the state.

The FRA expects state rail plans to provide detailed insight into the concerns facing state transportation systems and to set forth their vision of how rail transportation can address those issues.

In addition to PRIIA requirements, the *2009 Preliminary National Rail Plan* provides the states with a framework of elements that the FRA views as necessary for creating a viable national rail plan. The FRA encourages states to collaboratively raise additional issues and provide other relevant information. States need to consider all other modes of transportation, especially ways in which modes can be leveraged to serve transportation customers more effectively and efficiently.

The National Rail Plan will examine passenger and freight corridors running through and between states, and coordinate the states' plans into a blueprint for an efficient national system, thereby meeting both regional and national goals. The majority of the infrastructure is owned and

maintained by the freight railroads. Therefore, the FRA will continue to work with states to develop plans that contain proposals or initiatives for partnering with freight carriers and other stakeholders in the development of plans and objectives.

The National Rail Plan will likely encourage rail development and growth, much like the model of the interstate highway system. The plan will also recognize that the traffic flow of passengers and freight rely on the connectivity of regional corridors that pass through several states.

Future Roles

Washington State

The *Statewide Rail Capacity and System Needs Study* (2006) made the following recommendations about building and aligning existing state powers and authorities to further the state interest in the rail system (some recommendations have been implemented):

- Influence the investment decisions of the Class I railroads to resolve rail chokepoints of critical importance to key rail user groups in the state and, thereby, provide more capacity for state rail users. This will generally involve public-private partnerships in which the state is a minority partner, but the state's investment can influence the timing and priority of the Class I railroads' investment decisions.
- Increase advocacy for a federal program that addresses critical national rail capacity needs. Many of the key capacity chokepoints in the state rail system affect the national economy and shippers outside of the state. The state should look for federal action and funding to address these chokepoints.
- Work with rail users in industrial and agricultural markets to assist in the transition to rail service models that preserve high quality, reasonably priced, rail service options. The state can help ensure that these transitions occur in a timely fashion before the lack of action has negative economic consequences for the state.
- Work with third-party service providers and advocate for innovative operations practices and services that support the economic development goals of the state and its communities.
- Establish local governance models that allow shippers and affected communities to be involved directly in the resolution of short-line problems.
- Support cost-effective intercity passenger rail options that improve the overall balance and performance of the state's highway and air passenger systems.

- Create a more effective, centralized, rail management function within state government with authority to advocate and negotiate state interests with the railroads.[13]

The study recommended that the state continue to participate in the preservation and improvement of the freight and passenger rail transportation system where there are public benefits to state businesses and communities. The study also recommended that state decisions to participate in projects, programs, and other rail initiatives be based on a systematic assessment and comparison of benefits and costs across users and across modes.

State Rail and Marine Office

Based on recommendations of this study and previous studies, the State Rail and Marine Office should continue to preserve and improve the rail transportation system, guided by the following general principles.[14]

1. Emphasize operations and nonfinancial participation in projects before capital investment.
2. Preserve and target competition.
3. Encourage private investment that advances state economic development goals.
4. Leverage state participation by allocating cost responsibility among beneficiaries.
5. Require projects to have viable business plans.

The State Rail and Marine Office should be designated by legislation as the single entity to coordinate and direct the state's participation in the preservation and improvement of the rail transportation system. The office should have the authority to negotiate directly with the railroads.

As a single entity performing these duties, the State Rail and Marine Office should be able to:

1. Represent the interests of multiple stakeholders in negotiations with rail carriers more effectively than individual stakeholders by themselves.
2. Develop strategic packages of projects and actions across the state that would effectively promote state interest and be more attractive to the rail carriers than dealing with projects on a case-by-case basis.

[13] *Statewide Rail Capacity and System Needs Study*, Final Rail Study Report, Section 4.4 through Section 5.6, pp. 37-55, 2006.
[14] *Statewide Rail Capacity and System Needs Study*, Final Rail Study Report, Section 4.4 through Section 5.6, pp. 51-52, 2006.

3. Better serve the interests of multiple communities in resolving common rail issues.
4. Work more effectively with partners in other states and at the national level.

The State Rail and Marine Office should continue its leadership role to influence and shape state and national level development of rail policies and programs, including the coordinated development of multistate coalitions to address rail system needs across the Pacific Northwest.

The State Rail and Marine Office should continue its leadership role to work with the railroads to identify, prioritize, and implement the most cost-beneficial regional improvements.

The State Rail and Marine Office should also implement an asset management plan to govern investment and management decisions for state-owned rail assets. Guiding principles should include:

1. Decisions based on a business-case analysis of the goals and objectives for each class of assets.
2. Clear performance measures and a monitoring system to determine how assets are performing.
3. Benchmarks for each performance measure based on industry standards.
4. Development and use of an inventory management system, including information about condition and disposition of assets.

Continued Statewide Coordination and Partnerships

Public-public, public-private, and private-private partnerships of the future will increase in importance and include new financing mechanisms that involve multistate, multimodal coordination. The *Statewide Rail Capacity and System Needs Study* (2006) includes examples of innovative partnerships, such as rural rail transportation districts, multistate consortiums, statewide strategic partnership board, and rail operations forums. Rail operations forums, for example, are meetings of public and private sector rail stakeholders that are held on a monthly or quarterly basis. At the meetings, stakeholders discuss, plan, and implement operational actions that can improve the efficiency or velocity of the rail operations of the group.[15]

Investments in big projects with statewide public benefits will require public leadership and partnerships driven by public interest. With the American Recovery and Reinvestment Act of 2009 Track 3 and 4 grant

[15] *Statewide Rail Capacity and System Needs Study*, Tech Memo 10.3, pp. 1-8, (2006).

applications, for example, the lead agency of each project would need to develop a funding plan and partnership profile in order to demonstrate the 50 percent funding match and leverage funds for public funding support. To enable effective corridor-level system development with impacts beyond the confines of state boundaries, multistate multimodal coalitions and plans are needed. Such coalitions and partnerships, using a sound benefit/cost methodology based on goals and legislative priorities, will provide input into the state prioritization and investment processes to prioritize projects in the statewide public interest. The state will have an important leadership role to encourage partnerships that succeed in meeting future rail infrastructure priority needs.

Conclusion

The WSDOT State Rail and Marine Office has an increasing strategic planning role in statewide passenger rail and freight rail development. Clarification is needed to align the office's role and authority with the vision and goals developed earlier in this plan. To be in alignment with other state plans, the state passenger and freight rail plans should be combined into a "one-rail" plan and updated frequently in the future.

Washington State Department of Transportation

Chapter 7: Investment Prioritizing and Project Evaluation

Freight rail has many benefits. With its cost effectiveness, fuel efficiency, safety records, and lower environmental impacts, freight rail is a viable option to help solve economic, social, and environmental problems with integrated solutions.

The freight railroads in Washington State (state) are owned mainly by private entities and for-profit companies. Despite primarily private ownership, freight rail transportation provides public benefits that warrant taxpayer participation in improvements at both federal and state levels. The common public benefits associated with freight rail include stimulating the state's economy, supporting local communities and businesses with jobs and revenues, reducing congestion, improving public safety, offering a transportation choice for shippers, reducing environmental pollution, and saving energy.

Investment policies in freight rail are developed by both public and private policymakers. However, the benefits and costs from public perspectives are very different than those from private perspectives. Therefore public investment priorities, criteria, and decision-making processes are also different from those of private investment.

Decision makers of public investment include federal agencies, state agencies, tribal agencies, and regional and local public entities, such as counties, cities, and ports. Private investment decision makers include private entities and individuals, such as railroads.

Public and Private Benefits

For rail-related investment, private benefits have typically accrued to rail carriers, shippers, rail property owners, and other non-governmental groups. Public benefits are broadly assigned to government agencies that represent taxpayers.

The Passenger Rail Investment and Improvement Act of 2008 (PRIIA)[1] definitions of public and private benefit are described below:

[1] PRIIA (Public Law No. 110-432, Division B, enacted Oct. 16, 2008, Amtrak/High-Speed Rail).

Private Benefit

Private benefit is a benefit accrued to a person or private entity, other than Amtrak, that directly improves the economic and competitive condition of that person or entity through improved assets, cost reductions, service improvements, or any other means as defined by the Secretary.

Public Benefit

Public benefit is a benefit accrued to the public, in the form of enhanced mobility of people or goods, environmental protection or enhancement, congestion mitigation, enhanced trade and economic development, improved air quality or land use, more efficient energy use, enhanced public safety or security, reduction of public expenditures due to improved transportation efficiency or infrastructure preservation, and any other positive community effects as defined by the Secretary.[2]

Federal Requirements

The new law (PRIIA) requires the project list, in states' long-range service and investment programs, to document the anticipated public and private benefits and the public investment benefit-cost correlation for each project. PRIIA also specifies that states consider additional economic and societal impacts of investment projects (Exhibit 7-1).

Exhibit 7-1: Federal Requirements for Benefit Assessment and Documentation

Required Documentation for Each Project	**Anticipated private benefits**	• Economic competitiveness • Cost reductions • Improved assets • Service improvements
	Anticipated public benefits	• Congestion mitigation • Enhanced trade and economic development • Improved air quality • Improved land use • Enhanced public safety • Enhanced public security • Reduction in public expenditures • Community effects
	Correlation between public funding contributions and public benefits	***Statement and/or benefit/cost ratio***

Source: American Association of State Highway and Transportation Officials (AASHTO) *State Rail Planning Guidebook September 2009*

[2] *2009 AASHTO State Rail Planning Guidebook*

State Requirements

Under ESHB 1094, the Washington State Legislature required the Washington State Department of Transportation (WSDOT) to develop and implement the benefit/impact evaluation methodology recommended in the *Statewide Rail Capacity and System Needs Study*, which was published December 2006.

The study recommended that three categories of public benefits should be included in benefit/cost (B/C) analysis (Exhibit 7-2).

The study also recommended that the state measure benefits in terms of each user group. The measures that best describe the potential benefits and impacts to each group are presented in Exhibit 7-3.

Freight Rail Investment Analysis in Washington State

Priorities and Criteria

Projects should be evaluated using the same methodology that would provide consistent and objective comparisons to federal grants, state funds, local public entities, and private partners. The value of a standard methodology, or at least broadly accepted factors or parameters, is to establish mutually acceptable benefits vernacular for evaluating the projects side-by-side.

Priorities and criteria for evaluation reflect public investment policies and determine how the evaluation will be performed.

Benefit evaluation in this state will follow both federal and state priorities and criteria. PRIIA does not specifically require states to prioritize projects, but it does require a prioritization of options to increase intermodal connectivity. State legislation requires that WSDOT develop a B/C methodology and use it to evaluate state projects based on six clearly specified legislative priorities:

- Economic, safety, or environmental advantages of freight movement by rail compared to alternative modes.
- Self-sustaining economic development that creates family-wage jobs.
- Preservation of transportation corridors that would otherwise be lost.
- Increased access to efficient and cost-effective transport to market for the state's agricultural and industrial products.
- Better integration and cooperation within the regional, national, and international systems of freight distribution.
- Mitigation of impacts of increased rail traffic on communities.

Exhibit 7-2: Variables for the State Benefit/Cost Analysis

Variable Description	Explanation
Transportation and Economic Benefits	
Avoided maintenance costs	If the project preserves rail service, the no-action alternative may put more trucks on the highway. This may produce a net positive or negative benefit, to be evaluated based on the type of road affected and the cost of maintaining the rail line.
Reduction in shipper costs (for shipments originating in state) – freight only	Benefits are derived from lower logistical costs to the shippers, which ultimately can lead to lower consumer prices.
Reduction in automobile delays at grade crossings	Benefits result from improving grade crossings and decreasing automobile delays.
Economic Impacts	
New or retained jobs	Jobs that a particular project/action may keep from moving out of the state (e.g., by construction of a rail spur serving a factory or warehouse, etc.), or new jobs that are created within the state. Also to be considered are changes in job quality and pay levels (e.g., adding, losing, or changing union jobs). This measure accounts for both retained and new jobs.
Tax increases from industrial development	A rail action/project may foster industrial development that results ultimately in increased industrial property taxes to the state.
External Impacts	
Safety improvements	By diverting truck freight to rail, savings on highway safety improvements can occur.
Environmental benefits	Railroads are on average three or more times more fuel efficient than trucks. The state can benefit from savings due to environmental improvements.

Source: *Statewide Rail Capacity and System Needs Study* (2006)

Exhibit 7-3: Benefit and Cost Measures

Rail User	Benefit and Cost Measures
State	• Jobs created/retained (private sector, public sector, and impact on rail-related union jobs). • Tax benefits (through new or retained businesses). • Contribution to transportation system efficiency/balance (measured in terms of reduced travel delays, improved system reliability, or system redundancy as appropriate). • Environmental benefits (air pollution and water quality impacts). • Safety benefits (reduced property damage, injuries, and fatalities). • Availability of partner funding. • Cost to state. • B/C ratio (using recommended B/C analysis methodology)
Shippers	• Business cost impact (through impact on cost of service). • Access to service (does project increase rail/transportation service options). • Service reliability (on-time performance). • Transit time.
Passengers	• Rail capacity for passenger trains. • Travel costs. • Travel time. • Increased modal choice/access.
Railroads	• System velocity improvements. • Hours of train delay. • Yard dwell time. • Increased revenue traffic. • Equipment availability.
Ports	• Throughput. • Market share.
Communities (similar to state)	• Environmental benefits. • Safety benefits. • Reduced roadway delays and truck/auto delay at grade crossings. • Local jobs created or retained.

Source: *Statewide Rail Capacity and System Needs Study* (2006)

These priorities are in order of relative importance specified by the legislature. This requirement also directed WSDOT to evaluate rail project benefits compared to alternative modes.

Understanding Principles in Assessing Public Investment

Investment analysis in the public sector is very different from private sector analysis. There are several principles that must be understood in analyzing public investment and public benefits.

Discounting

Discounting addresses the problem of translating values from one time period to another. The larger the discount rate, the more weight that is placed on benefits and costs in the near-term, over benefits and costs in the future. Long-term benefits, such as environmental quality, are important public policymaking criteria. Consequently, public investment analysis usually uses a relatively lower discount rate than the private sector.

Leveraging

Public projects usually involve multiple sources of investment and partnership. While the analysis of such an investment assesses the efficiency, it also assesses the effectiveness of public investment only. In other words, a measure of the effectiveness of public investment is how much additional investment a public investment can bring into a specific project. This measure is called leveraging.

Distributional Benefits

Many public investment projects provide distributional benefits to the public by transferring public resources to where they are needed most. Such a transfer payment is not a traditionally defined benefit. It could be measured as a public benefit, if it helps reach the goal of public policy to benefit the targeted public group.

With/Without Principle

Many public investment projects provide benefits to the public by mitigating negative impacts. While such investment does not create positive value, it reduces the negative value. The difference between the larger negative value and the smaller negative value is defined as a benefit based on the with/without principle. For example, a freight rail capital project could lead to removal of some trucks from a highway. This will reduce environmental emissions since rail, in general, has less emission per ton-mile. Without such an investment project, societal loss due to higher emissions would be much larger. The reduced societal loss would be the benefit of the investment project.

Period of Analysis

The length of a period used for analyzing benefits and costs is very important. Many public benefits last for a long period of time, while investment occurs in early stages of a project life. Therefore, a full lifecycle is preferred in public investment analysis.

Evaluation Strategies and Methods

PRIIA-Defined Benefits and Potential Project Evaluation Strategies

Exhibit 7-4 outlines each of the PRIIA-defined benefits and potential project evaluation strategies for these benefits.

Exhibit 7-4: PRIIA-Defined Benefits and Evaluation Strategies

Benefits	Source of Benefits or Impacts	Potential Measurement
Economic competitiveness	Improved assets and service reliability or frequency allows companies to do business more efficiently.	Lower business costs (e.g., savings resulting from faster travel time and other improvements) increase the competitiveness and business attraction to the state.
Improved assets	Infrastructure, rolling stock, or facilities improvements.	Lower costs for capital maintenance of assets.
Cost reductions	Time savings provides unit cost reductions (labor, inventory, etc.) accruing to carriers, shippers, and passengers.	Lower total business costs (from all categories) and lower personal travel costs (e.g., less auto maintenance and gasoline; fewer hours of highway delay).
Service improvements	Time savings, improved reliability, new access, increased frequency, added capacity.	Time savings due to increased speed, reliability, and frequency accruing to rail passengers, carriers, and shippers.
Enhanced mobility of people and goods	Improved mode choice options and services.	Reduced distance to passenger stations or freight terminals and improved intermodal linkages.
Environmental protection or enhancement	This consideration is closely related to air quality effects (below) but could measure other benefits to water quality, wildlife, noise, historic resources, or other factors outlined in National Environmental Policy Act (NEPA).	States should use existing study information from Environmental Impact Statements (EIS), Environmental Assessments (EA), or other resources and customize to the unique characteristics of the project.

Benefits	Source of Benefits or Impacts	Potential Measurement
Congestion mitigation	Highway-to-rail diversion of passengers and freight decreases highway congestion. Investment in rail capacity decreases rail congestion.	Some statewide or multi-state highway models can predict change in hours of delay. Other tools, including FHWA's HPMS or HERS can be used to estimate delay effects. Rail carriers can predict similar measures.
Enhanced trade and economic development	Similar to the economic competitiveness measure with benefits originating from improved travel time, capacity, or improved access or connectivity.	Estimated increase in tonnage or value of commodities due to rail improvement.
Improved air quality	Changes in mode share are the chief drivers of air quality benefits. On a per-passenger-mile and per-ton-mile basis, rail generally produces more savings than other modes.	Use the change in miles traveled by mode to estimate the net reduction in emissions from standard factors for pollutants produced on a per-mile basis for passengers or freight.
Improved land use	Better coordination of transportation and land use.	Percentage of residents and businesses with good access to rail facilities/stations. Cost savings by reducing average trip distance to rail by auto or commercial vehicle.
Enhanced public safety	Reduced highway vehicle miles traveled (VMT) for truck and auto, lowering crash exposure.	Savings resulting from lower medical care, vehicle repair, highway delay, and legal costs associated with crashes. Standard cost of crash rates per mile.
Enhanced public security	Protecting the public from crime or terrorist events results in public cost savings similar in scope to those associated with safety.	Reduced risk of security incident resulting from investment in surveillance, physical barriers, or other measures.
Reduction in public expenditures	Improved transportation efficiency or infrastructure preservation from decreased highway VMT.	Savings from lower maintenance and safety directly resulting from lower auto and truck VMT.
Community effects	Enhanced livability provided by expanded transportation options, including intermodal linkages, walk-ability, and local commerce.	New or improved linkages between modes, high-density development, and non-motorized transport (e.g., walking paths, bike trails).

Source: *AASHTO State Rail Planning Guidebook* September 2009

Methods Recommended in the *Statewide Rail Capacity and System Needs Study* (2006)

The Washington State Transportation Commission (WSTC) *Statewide Rail Capacity and System Needs Study* used several sources of information to determine the variables to measure public benefits in the state, including the following:

- Best practices review of rail B/C methodologies used by other states and organizations.
- Consultation with area experts—including shippers, community association representatives, ports, railroads, and others—who are members of the Washington State Rail Study Technical Resource Panel.
- Metrics derived from established state policy as captured in the Revised Code of Washington and in previous case studies of state participation in the rail system.

The study recommended that B/C ratio be applied to all projects, both passenger and freight. The B/C ratio would enable state decision makers to evaluate cost-benefit tradeoffs and not focus solely on benefits. The precise calculation methodology for the B/C ratio is left to WSDOT to finalize and may vary depending on the project type and the level of investment. The study also recommended that the three category benefits (in Exhibit 7-2) are quantified in the benefit/impact methodology to be developed by WSDOT.

However, the B/C ratio is only one of the measures used to evaluate benefits and impacts to the state. Some of the other measures are also included within the B/C calculation, but they are also broken out separately so that decision makers can weight these more heavily when making decisions than they would be in a true B/C ratio. The framework does not recommend a specific weighting procedure, but leaves this decision to the legislature or the WSTC.

The study also recommended user group benefit assessment. Measures that best represent public benefit are determined for each user group. The metrics to characterize and measure the public benefit of a rail action are presented in Exhibit 7-3. The metric selection reflects the stakeholder involvement process in WSTC's study. Benefits and impacts of individual projects or groups of projects are evaluated for each of four groups of affected parties: 1) the state; 2) users (shippers and passengers); 3) carriers (railroads and ports); and 4) communities (affected by rail service to or through the community). The idea of the framework is to determine whether the impacts of the project or package on each group is positive or negative, and if the impact is high, medium, or low, relative to the needs

of that group. The results of this evaluation tell whether other parties should be involved in the project and what type of partnership arrangement is most appropriate. The evaluation of a project as having high, medium, or low benefits/impacts is always based on a comparison with some other action—at least a no-action scenario, but preferably at least one other option that may or may not involve providing the transportation service by another mode (Exhibit 7-5).

Exhibit 7-5: Possible Methodology to Measure Public Benefit in Washington State

	Measures	No action	Alternative A	Alternative B
State	Jobs			
	Tax/Fee Benefits			
	System Efficiency			
	Environmental Benefits			
	Safety Benefits			
	Partner Funding			
	Cost to State			
	Benefit/Cost			
	Transit Time			
Summary State				
Shippers	Business Cost Impacts			
	Access to Service			
	Service Reliability			
Summary Shippers				
Passengers	Rail Capacity for Passenger Trains			
	Travel Costs			
	Travel Time			
	Increased Modal Choice/Access			
Summary Passengers				

	Measures	No action	Alternative A	Alternative B
Railroads	System Velocity Improvements			
	Hours of Train Delay			
	Yard Dwell Time			
	Increased Revenue Traffic			
	Equipment Utilization			
Summary Railroads				
Ports	Throughput			
	Market Share			
Summary Ports				
Communities	Environmental Benefits			
	Safety Benefits			
	Reduced Roadway Delays			
	Local Jobs			
Summary Communities				
National	Percent Benefits in Washington State			
	Other States Benefiting			
Summary National				

Source: WSTC *Statewide Rail Capacity and System Needs Study* (2006)

Rail Benefit/Impact Evaluation Methodology – Description

The benefit/impact evaluation method was developed in 2007, based on legislative direction and priorities specified by the legislature.

Stakeholder Involvement

WSDOT formed an advisory group that includes a broad range of stakeholders to guide the development of Rail Benefit/Impacts Methodology. The Advisory Committee consisted of the Freight Mobility Strategic Investment Board, Department of Commerce, Department of Agriculture, WSTC, labor, mainline railroads, short-line private railroads, representatives from cities and counties, various ports, legislative and Governor's staff, and WSDOT staff.

Guiding Principles

The Advisory Committee developed six guiding principles for the development process:

- Provide a benefit/impact evaluation methodology and supporting tools as recommended in the *Statewide Rail Capacity and System Needs Study* (2006).
- Develop a benefit/impact evaluation methodology that includes the priorities set forth in ESHB 1094.
- Develop a benefit/impact evaluation methodology that includes measurable public benefits.
- The *Statewide Rail Capacity and System Needs Study* (2006) recommends using only a few good measures, including applying qualitative analysis techniques.
- This document is dynamic and proposed alternative evaluation methods should be reviewed for incorporation or used as supplements.
- Decision makers will take into account the public interest and good, going beyond analysis of single stakeholder interests.

Rail Benefit/Impact Evaluation Methodology

The Rail Benefit/Impact Evaluation Methodology is comprised of the following components:

- Rail Benefit/Impact Evaluation Methodology (Guidance Document)
- Proposal Application
- Rail Benefit/Impact Evaluation Workbook
  - Legislative Priority Matrix
  - Project Management Analysis
  - User Benefit Levels Matrix
  - Benefit/Cost Analysis Calculator
  - Benefit/Cost Analysis Summary Sheet
  - Benefit/Impact Evaluation Summary Sheet

The components of the methodology are intended to assist the decision maker in the evaluation and recommendation process. The level of rigor applied to the use of any tool should recognize the type, size, and complexity of project and expectations of results.

Application Process

The application for a rail grant or loan is the document that gathers the initial information that will be evaluated for possible selection. The application needs to collect enough information to effectively start the evaluation and selection process. It also needs to contain information for follow-up calls to users and applicants.

Since calls for projects may be driven by a variety of factors and limitations, there needs to be clear communication on the application document to ensure the right information is gathered. A standard application may not fit all calls for projects; therefore the application may need to be modified to gather the appropriate information.

At other times, a project may simply be assigned without an application process through legislation. Such a project still requires that a benefit/impact evaluation be conducted and the results and recommendations shared with the appropriate parties to validate the project or show the level of impacts and alternatives.

Benefit/Cost Calculator

The B/C Analysis is a major component of the Rail Benefit/Impact Evaluation Methodology that will be used when evaluating rail projects. The calculation (B/C ratio) produced will also be supplemented with an assessment of other benefit categories. That supplemental information will be generated by the requested project information in the application form. The major categories for B/C Analysis will be:

- Transportation and economic benefits.
- Economic impacts.
- External impacts.

The Benefit/Cost Analysis Calculator was created to assist in a fast evaluation of benefits as specified in the previous section. The Benefit/Cost Analysis Calculator is a spreadsheet with areas of benefit, equations for calculations, and benefit parameters to calculate the B/C ratio for a given project or action on a project.

The defined equations and input areas in the calculator are based on documented standards, research, and common practice. These equations will be periodically reviewed and updated with changes in industry practices, price indexes, and new accepted standards. The input values must be verified based on actual data and verifiable field information in consideration of expected project results, freight logistics, user logistics, local economic influences, current costs, impacts to industries, and historical data. The Benefit/Cost Analysis Calculator uses default values that are included in the equations contained in the Benefit/Cost Instruction sheet. They are used to calculate a dollar value for benefits. These default values are based on generally accepted practices and some may need to be adjusted for project specific goals and objectives. For more detailed information on the application of values to specific project objectives and

goals, a review of *NCHRP Report 586* should be done.[3] WSDOT economists will update these default values every biennium.

Legislative Priority Matrix

This qualitative evaluation tool was also developed to help policymakers understand the results and effects of proposed investment. One of these qualitative matrices is Legislative Priority Matrix. The Legislative Priority Matrix worksheet is intended to help the evaluator determine how a project aligns with the legislative priorities. The priorities were provided in a relative order of importance. Each priority area is weighted based on that order.

The benefit measures that have been identified for each priority are to be used as a baseline of measures. In the future, there may need to be other or different measures considered for a project. As the new measures and their parameters are identified and proven, they should be included for use on future projects. This matrix is used to aid benefit/impact evaluation in terms of state priorities and to provide additional information based on expert and value judgments to determine a project's public value.

Project Management Assessment Matrix

The Project Management Assessment Matrix is intended to help determine the current status of the project and how likely it can successfully be delivered within the constraints of scope, schedule, and budget. The scores are compiled to determine a project management score. The comment box should note how a score was determined.

User Benefit Levels Matrix

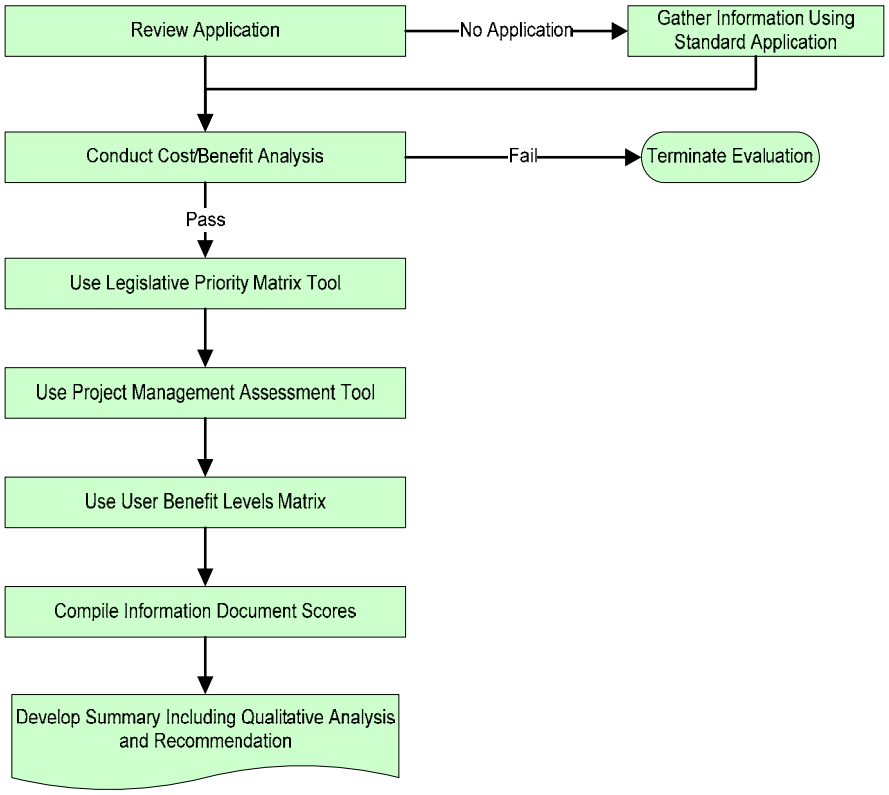
The User Benefit Levels Matrix is intended to help determine who benefits from the project and at what level. Each measure of the matrix is to be completed by assigning a percentage that represents the amount of benefit for each user. The percentage of benefits is then added for each user and divided by the number of measures used, to provide an overall project benefit for each user.

Project Evaluations

A project evaluation may begin with a proposal application or by a request from the legislature. Both will require evaluation steps to be completed as indicated in Exhibit 7-6 and as described below:

[3] TRB NCHRP Report 586: Rail Freight Solutions to Roadway Congestion - Final Report and Guidebook.

Exhibit 7-6: Benefit Impact Evaluation Process



1. Review the application or obtain information to conduct the evaluation. If there is no application, use the current general project application, eliminating superfluous questions. This is a tool to identify what information is needed from the project stakeholders.
2. Next, the WSDOT State Rail and Marine Economist will compile data for a B/C analysis and use the Benefit/Cost Analysis Calculator. Any additional data or information necessary to analyze the true benefits and costs will be included. This may require a qualitative analysis and summary.
3. If the Benefit/Cost Analysis Calculator indicates a ratio greater than one, then the Legislative Priority Matrix should be used. The evaluator should use the tool as indicated in its guidance for each priority measure. Once complete, justification for selections and a score will become part of the project documentation.
4. The evaluator will use the Project Management Assessment Matrix. If the evaluator has questions on any of the project management assessment areas, they should contact one of the State Rail and Marine Office Project Managers. This will ensure consistent interpretation with adopted standard operating procedures.
5. The final tool to be used is the User Benefit Levels Matrix. This tool helps determine which users are receiving a benefit and at what level.

6. Once a project has been through the above steps, the evaluator needs to compile all of the information to generate a score and to develop a recommendation. Depending on the project, a qualitative summary may need to be included to convey benefits that are not easily quantifiable.
7. If there are multiple recommendations, a summary should be written to incorporate all recommendations for easy review.

Decision Documentation

While the workbook spreadsheets provide documentation and justification for the decisions made, there may be additional documentation requirements. Documentation on value judgments that are qualitative rather that quantitative will need to have supporting information about the decision. When required, the decision documentation package should include:

1. Summary of spreadsheet determinations including alternatives.
2. Additional social or economical values considered.
3. Justification for value judgment determinations.
   a. Benefits and impacts reviewed.
   b. How the reviewed benefits and impacts apply.
   c. Determination considerations.
   d. Justification documentation.

Appendix 7 provides more details about the benefit/impact methodology.

Limitations and Future Improvements

Limitations

The Rail Benefit/Impact Evaluation Methodology has limitations:

- While this tool is a way to consistently evaluate proposed projects in a fast-paced legislative decision process, it is more suitable for smaller size projects that need decision support information in a short timeframe. Large investment projects need customized B/C analysis and socioeconomic impact assessment specifically designed for the project, based on both federal and state requirements and other specific considerations.
- While default benefit values built into the model can provide consistent and fast analyses to present valuable information, these values, in general, reflect an average of those benefits. Some projects deviate greatly from the average situation and might find that the benefit evaluation from the tool is not accurate. Again, large

investment projects need a customized B/C analysis and socioeconomic impact assessment to justify the size of the investment.

- The evaluation of societal impacts is standard in this tool. This might not reflect true societal impacts of some rail projects. Large investment projects need a more detailed assessment of societal impacts of the rail project.

Future Needs and Improvements

The methodology was developed primarily based on state requirements and federal requirements before PRIIA. The new federal requirements to evaluate and document project benefits have not yet been incorporated into the methodology. WSDOT is prepared to update the methodology when federal guidelines become available.

The Rail Benefit/Impact Evaluation Methodology and tools have been developed with the ability to expand future versions. One such expansion will be the inclusion of the information from the Statewide Rail Data and Analytic Program. This new information will be part of all project evaluations once it is available. Incorporation of this data into project evaluations will generate recommendations consistent with statewide freight strategic goals.

In addition, as changes in the economy and state goals occur, the methodology will need to be updated to ensure the correct benefits and measures are being used. The methodology addresses the need to use lessons learned for improvement as well as being dynamic enough to stay current. A technical work group will be put in place to periodically review baseline evaluation results and the latest evaluation results to ensure that the correct measures and benefits for the current freight conditions are being used.

Washington State Department of Transportation

Chapter 8: Financing Washington's Freight Rail System

This chapter reviews the needs of Washington State's (state) freight rail system as identified by the stakeholders and Washington State Department of Transportation (WSDOT) staff. The project list is discussed followed by a synopsis of funding sources. The chapter concludes with the vision of future funding for state freight rail investments.

Needs for Investment

This section presents short- and long-term freight rail needs in the state. The needs assessment is based on unconstrained capital projects submitted directly by the state's railroads, ports, public agencies, and other key stakeholders. The needs assessment identifies 109short- and long-term statewide capital improvement projects and initiatives. The total investment needed for the projects, where cost estimates are available, is $2.0 billion.

Driven by customer demands and changing trends, freight rail needs constantly change. The primary purpose of the needs assessment is to develop a comprehensive project list of unconstrained, current priority freight rail improvements as identified by the stakeholders. This list will allow WSDOT to gauge the condition of the system and assess potential public involvement. The freight railroad system needs include both private and public sector capital improvement projects.

Inclusion of a need/project in the *Washington State 2010-2030 Freight Rail Plan* does not constitute a commitment on the part of WSDOT or the state to provide funding.

Exhibit 8-1 describes the needs identification process to develop the project list.

Exhibit 8-1: Needs Identification Process

Timeframe	Activity
March through June 2009	Develop the Projects Survey (online and PDF file formats) based on American Association of State Highway and Transportation Officials (AASHTO) guidelines, model rail plans, and key stakeholder interviews.
	Introduce the needs assessment and survey tool at the June 11 Advisory Committee kick-off meeting.
July through December 2009	E-mail the Projects Survey to Advisory Committee, railroads, ports, shippers, Metropolitan Planning Organizations (MPO)/Regional Transportation Planning Organizations (RTPO) Coordinating Committee, and associated organizations.
	Use e-mail, Web site, and e-newsletter to promote the survey and encourage responses.
	Open the survey to maximize responses. The survey was originally opened from July 31 to August 19, extended to August 21, then left open.
	Review survey responses and clarify any questions. Present a project list summary for discussion and suggestions at the September 30 and October 6 Advisory Committee meetings.
	Augment the project list and needs assessment based on suggestions, prior studies, sources, and knowledge of WSDOT project team.
	Evaluate and analyze the project list for inclusion in the plan.
	Review the project list with stakeholders as part of the overall plan review process.

Source: WSDOT State Rail and Marine Office

The plan does not include all of the statewide freight rail needs for several reasons. First, the freight railroads are private, for-profit businesses. In some cases, they did not submit all their capital needs for inclusion in this public document. This is especially true in cases where private capital is available to fully fund planned improvements, where railroads believe that public involvement in specific projects is less likely, and where disclosure of a need could adversely affect strategic business ventures. Second, the

outreach effort to develop the needs assessment/project list was limited due to resources available. Increased outreach to stakeholders could encourage respondents (i.e. more interviews, more rounds of review) to identify more projects. Therefore, the needs/projects list in this plan represents those projects that have been submitted and do not involve speculation or rumors.

The project list includes project information about the organization and railroad, project type, public benefits, private benefits, and project estimates and funding details. Projects range from well-developed projects to new concepts. Chapter 5 includes a discussion of large-scale emerging projects that are not included in the project list.

Projects Survey

The project list contains the detailed needs submitted by freight stakeholders participating in developing the *Washington State 2010-2030 Freight Rail Plan*. Appendix 8-A contains the project list that was generated by the Projects Survey with the following data collection fields:

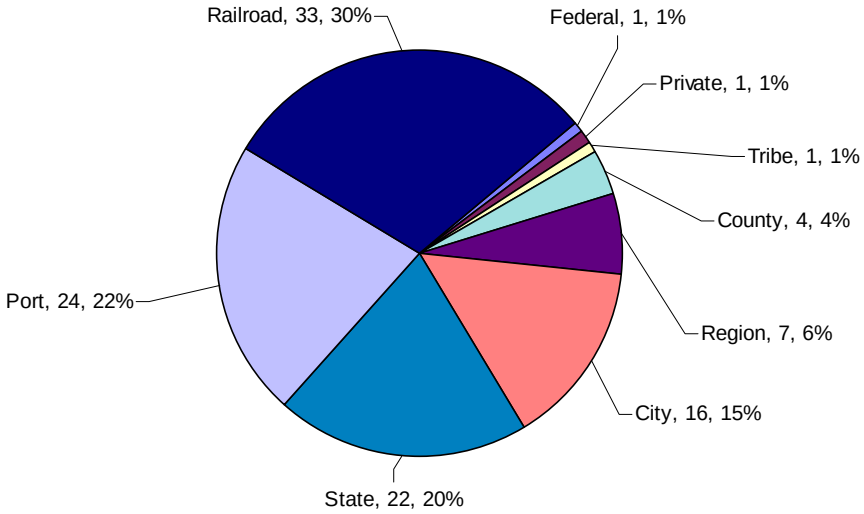
- **Respondent Information.** Organization, name, title (optional), e-mail address, and phone number.
- **Project Information.** Railroad owner (list of railroads was provided), railroad operator (list of railroads was provided), and any others involved in the project (optional).
- **Project Details.** Project name, location, description (optional).
- **Project Benefits.** Project type (list of project types was provided), public benefits (list of public benefits was provided, optional), and private benefits (list of private benefits was provided, optional).
- **Project Estimates and Funding Details.** Estimated total project cost, cost breakdown (preliminary engineering, right-of-way, construction, unknown), committed funds (federal, state, local, tribal, private, other), additional funds needed (federal, state, local, tribal, private, other), start dates (preliminary engineering, right-of-way, construction), and estimated project completion date.

The project list has been edited for length and clarity, but otherwise represents the extent of information provided by the stakeholder participants in the needs identification process. Thus, some cells are blank and, for some needs, there is a lack of cost estimates and other information that may become available in the future. The amount of detail provided varies by stakeholder. For example, a railroad may have included milepost information as part of the location description while another stakeholder may have referenced only the county.

Project Summaries

A general project assessment is provided below. Exhibit 8-2 shows the project respondents. Note that top respondents are ports, railroads, and the state.

Exhibit 8-2: Survey Respondents



Source: WSDOT State Rail and Marine Office

Estimated Completion Dates

Exhibit 8-3 shows a summary of projects and their project completion dates. Note that most of the reported project completion dates are 2010 and 2011.

Exhibit 8-3: Estimated Completion Dates

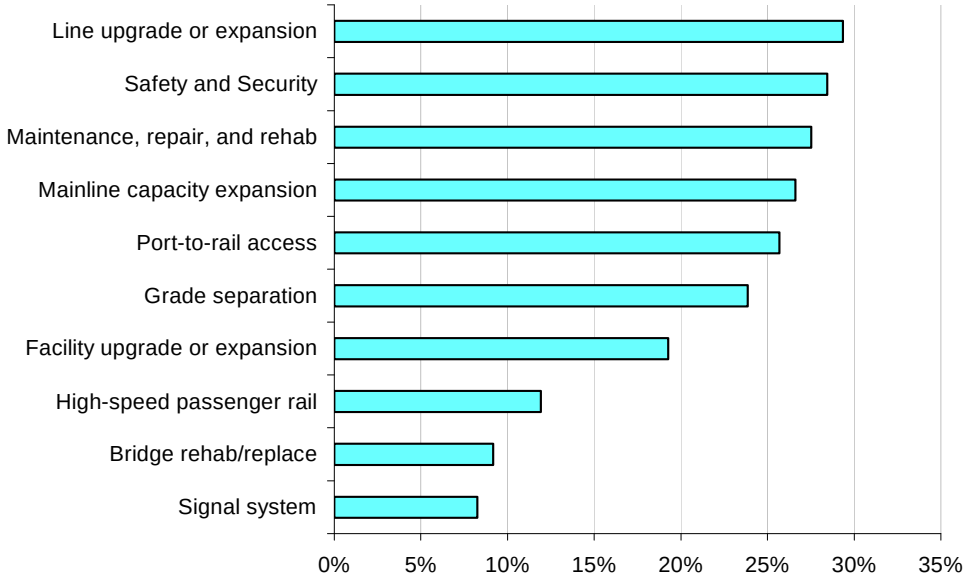
Year of Expected Completion	Number of Projects
2010	12
2011	21
2012	5
2013	4
2014	6
2015	2
2016	2
2018	1
2020	2
Not Specified	54

Source: WSDOT State Rail and Marine Office

Project Types

Exhibit 8-4 shows a summary of projects that reported project types (multiple choices are possible). Note that the top project types are line upgrade or expansion; safety and security; maintenance, repair and rehab; mainline capacity expansion, port-to-rail access, and grade separation projects.

Exhibit 8-4: Project Types

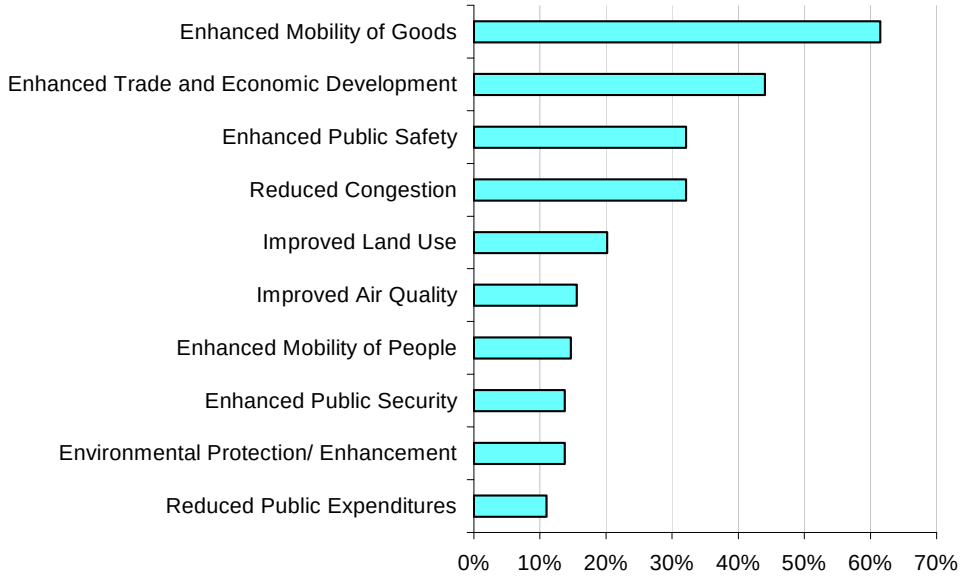


Source: WSDOT State Rail and Marine Office

Public Benefits

Exhibit 8-5 shows a summary of projects that reported public benefits (multiple choices are possible). The most common public benefit is enhanced mobility of goods, followed by enhanced trade and economic development, enhanced public safety, and reduced congestion.

Exhibit 8-5: Public Benefits

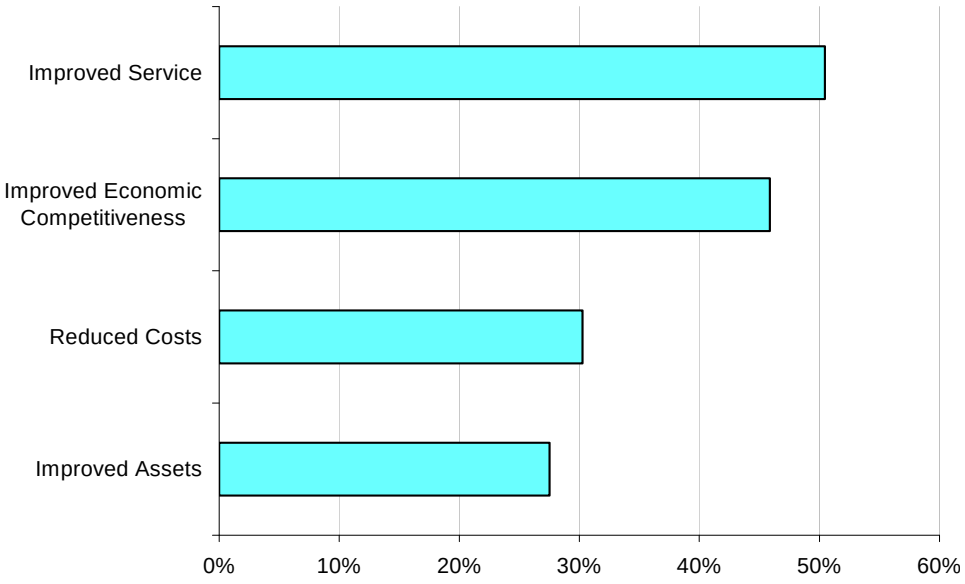


Source: WSDOT State Rail and Marine Office

Private Benefits

Exhibit 8-6 shows a summary of projects that reported private benefits (multiple choices are possible). The top benefit is improved service, followed by improved economic competitiveness, reduced costs, and improved assets.

Exhibit 8-6: Private Benefits



Source: WSDOT State Rail and Marine Office

Mainline Summary

Class I railroad owner or operator projects that reported project type (multiples are possible) are primarily mainline capacity upgrade and safety and security projects. The top public benefits are moving goods, trade and economic development, and safety and security. The top private benefits are economic competitiveness and improved service.

Short-Line Summary

Class II or Class III railroad owner or operator projects (not in the summary above) that reported project type (multiples are possible) are primarily maintenance and rehab, line upgrade, and facility upgrade projects. The top public benefit is moving goods. The top private benefits are economic competitiveness, reduced costs, and improved service.

Port-to-Rail Projects Summary

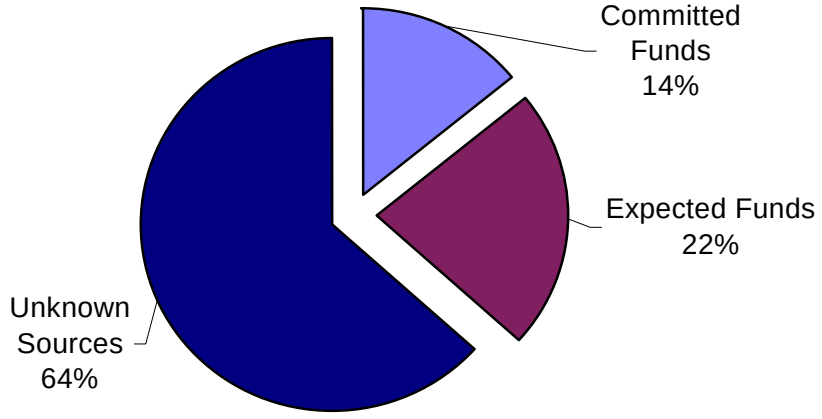
Of the reported projects, 26 percent listed port-to-rail access as one of the project types.

Funding Needs Summaries

Funding Needs by Commitment

Of the projects that report funding needs, only 14 percent are reported as committed funds, 22 percent are reported as funds expected from various sources, and 64 percent are reported as needs that have no identified sources (Exhibit 8-7).

Exhibit 8-7: Funding Needs by Commitment

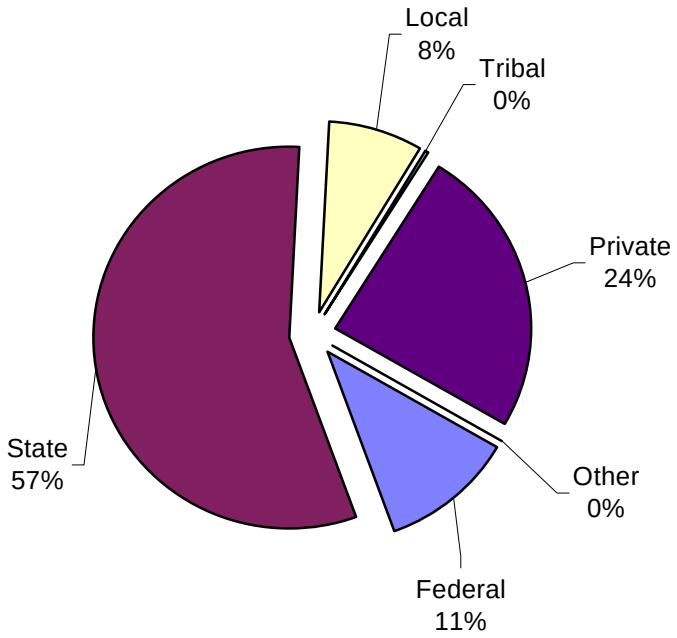


Source: WSDOT State Rail and Marine Office

Committed Funds by Source

Breaking down the committed funds portion further shows that of those projects that reported committed funds, 57 percent reported as state funds, 24 percent reported as private funds, 11 percent was reported as federal funds, 8 percent reported as local funds, and 2 percent reported tribal funding needs (Exhibit 8-8).

Exhibit 8-8: Committed Funds by Source



Source: WSDOT State Rail and Marine Office

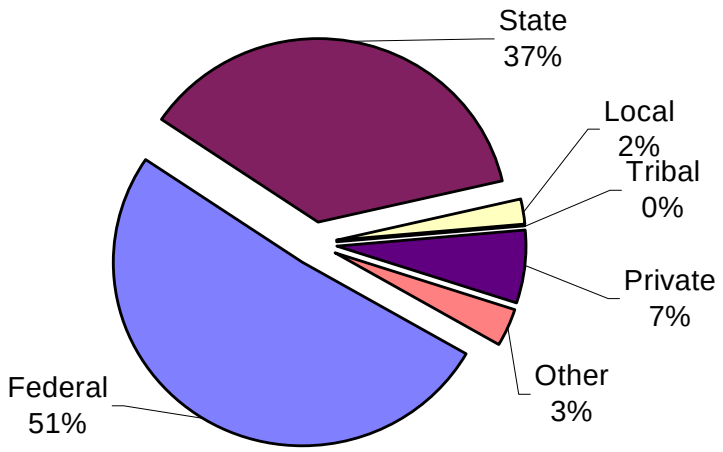
Expected Funds by Source

Of the projects that reported expected funds, 51 percent are expected from federal sources, 37 percent are expected from state, 7 percent are expected from private sources, 2 percent are expected from local funds, and 3 percent are expected from other sources (Exhibit 8-9).

The expectation of a 51 percent share from federal sources is very optimistic. This is 11 percentage points higher than the average federal aid of 40 percent for highway capital expenditure projects over the last 50-year history of that program.[1]

[1] TRB Special Report 297, Funding Options for Freight Transportation Projects, November 2009 pg 25.

Exhibit 8-9: Expected Funds by Source

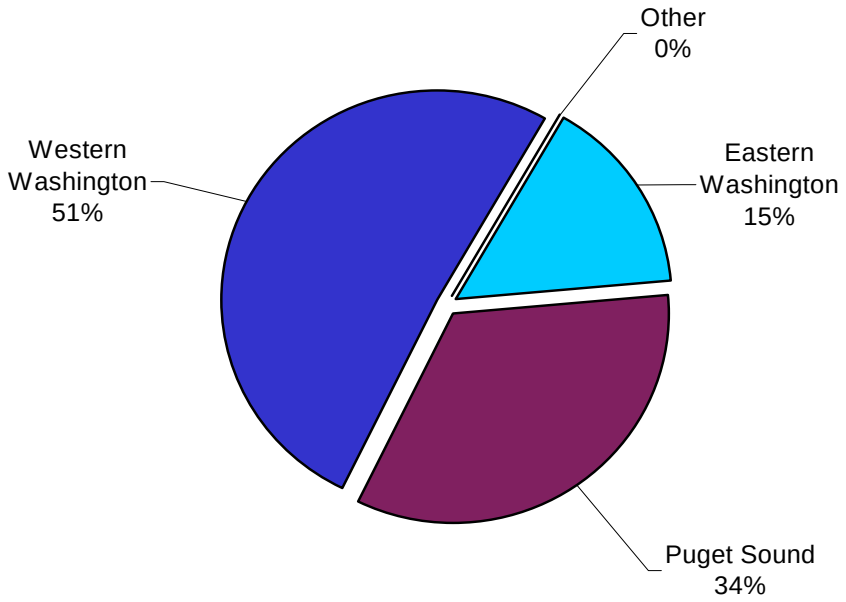


Source: WSDOT State Rail and Marine Office

Funding Needs by Area

In Exhibit 8-10, about half of the projects are located in western Washington, one-third is located in Puget Sound area, and most of the remaining projects are located in eastern Washington.

Exhibit 8-10: Funding Needs by Area



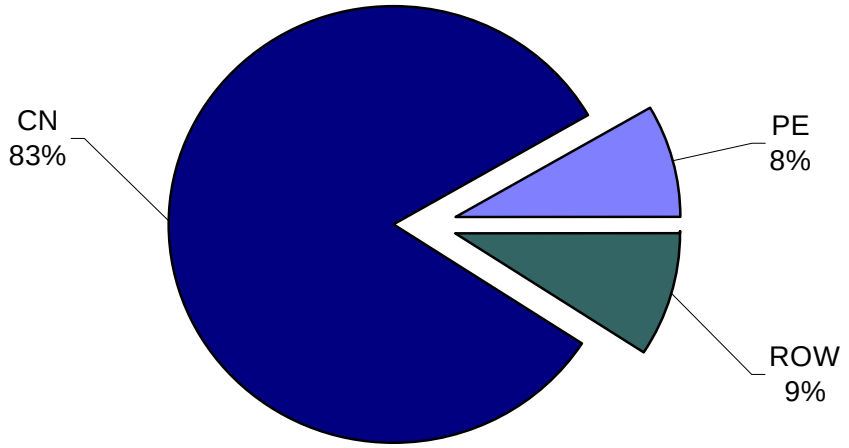
Source: WSDOT State Rail and Marine Office

Funding Needs by Phase

Of the projects reporting funding needs by project phase, 83 percent of the funding needs are associated with the construction (CN) phase of development. Right-of-way (ROW) and preliminary engineering (PE)

phases have funding needs of 9 percent and 8 percent, respectively, as shown in Exhibit 8-11.

Exhibit 8-11: Funding Needs by Phase



Source: WSDOT State Rail and Marine Office

The summaries above are very rough indicators, in part, due to the limited amount of data processing completed at this stage of freight rail statewide needs assessment. However, they do provide some value and insight into statewide need. The State Rail and Marine Office will continue to work with stakeholders to further clarify statewide need, improving the quality and quantity of the project information and analysis.

Funding for Freight Rail

All state and federal governments must address the needs for rail within the United States (U.S.). At the federal level, there has not been a dedicated nor consistent source of funds for rail development. This has resulted in rail receiving only 1 percent of the governmental expenditures as compared to the other transportation modes as shown in Exhibit 8-12 below. From 1995 to 2006, overall actual government funding for all modes has increased by 40 percent, with air transport doubling. Governmental support of rail expenditures remained at 1 percent of the total expenditure. Highway funding, as the largest sector at $99 billion, lost expenditure shares over a 10-year period, dropping from 63 percent of the total down to 50 percent.

Exhibit 8-12: Governmental Transportation Expenditure by Mode
($ Millions)

Mode	1995	% of Total	2006	% of Total
Highway	$90,075	63%	$99,784	50%
Transit	25,460	18%	44,097	22%
Rail	1,049	1%	1,548	1%
Air	19,250	13%	41,195	21%
Water	6,623	5%	10,888	5%
Pipeline	24	0%	91	0%
General Support	775	1%	1,795	1%
Total	**$143,256**	**100%**	**$199,398**	**100%**

Note: Percentages may not add correctly due to rounding.

Source: U.S. Department of Transportation (USDOT), Bureau of Transportation Statistics, 2009

Numerous studies have identified the need for increased rail investment nationwide. Many of these studies called for the federal government to become a stronger rail investment partner.

On the passenger rail side, the Passenger Rail Investment and Improvement Act of 2008 (PRIIA) authorized slightly more than $13 billion over a 5-year period to Amtrak and states to encourage the development of new and improved intercity rail passenger services. The American Recovery and Reinvestment Act of 2009 (ARRA) provides the ability for states to apply for funds to design and build high-speed rail corridors for passenger movement.

In addition to the high-speed rail grants, there are $27 billion of highway infrastructure funds available to states for "shelf" ready highway projects. States will receive the funds and will have 120 days to allocate those funds—each state has a large degree of freedom on what projects to fund. The $27 billion constitutes the majority of the funds destined for highway infrastructure spending under the stimulus act.

A third source of grant funds under ARRA is Transportation Investment Generating Economic Recovery (TIGER) grants. Eligible projects for this grant program include highway or bridge work normally funded under programs like the Surface Transportation Program; public transportation projects, such as those funded by the New Starts or Small Starts program;

passenger and freight rail infrastructure projects; and port infrastructure projects.

Eligible TIGER grantees include state, local, tribal, and territorial government entities, such as transit agencies, port authorities, and multijurisdictional coalitions. Award amounts will range from a minimum of $20 million to a maximum of $300 million, though the USDOT may waive the minimum threshold in the case of small projects.

These are examples of a substantially increased role of the federal government in funding the nation's passenger rail network. At the state level, the state funding has been accomplished through small funding sources that need to be reauthorized every couple of years.

Within the state the majority of the rail lines are privately owned and the majority of the passenger rail movements share these rail lines with freight. The efforts of the federal government has helped leverage other limited resources to improve our rail systems. But the needs for these rail system improvements always exceed the funding available for these improvements.

The state has had a longstanding involvement in passenger rail service, investing heavily to develop the Amtrak *Cascades* intercity passenger rail service. Since 1994 it has also provided emergency funding to failing short-line railroads and purchased specialized freight cars to ensure that agricultural shippers in the state have access to service and equipment.

The Washington State Transportation Commission prepared and submitted the *Statewide Rail Capacity and System Needs Study* in 2006. The key question asked by the legislature of this study was: "Should the state continue to participate in the freight and passenger rail system, and if so, how can it most effectively achieve public benefits?" The conclusion was that the state should continue to participate in freight and passenger rail systems.

The study concludes that the economic vitality of the state requires a robust rail system capable of providing its businesses, ports, and farms with competitive access to North American and overseas international markets. However, it also concludes that the mainline rail system is nearing capacity. Service quality is strained and rail rates are going up for many state businesses. The pressure on the rail system will increase as the state economy grows over the long term. It is recognized that although the long-term trend increases over time, there are major fluctuations year to year in the growth pattern. The total freight tonnage moved over the state rail system is expected to increase by 2 to 3 percent per year for the next

20 years. The state's role is necessarily shaped by the fact that nearly all freight railroads are privately-owned, for-profit companies.

The major freight railroads are investing to add capacity and improve service in the state, but their business practices and investment priorities are understandably driven primarily by the railroads' national-level needs and competition. The needs of state businesses and communities are just one part of the railroads' considerations. Additional investment and incentives for investment are needed to ensure a robust rail system that meets the state's economic needs, as well as the railroads' business needs.

A carefully planned program of state investments, and other actions that are consistent with the policies recommended by that study, will allow the state to realize a higher level of public benefits—in economic growth, jobs, tax revenues, and reduced community impacts—from the rail system than would be obtained without state participation. However, the state should invest only when it has been demonstrated that projects will deliver public benefits to the citizens and businesses of this state, and when it has been demonstrated that there is a low likelihood of obtaining those benefits without public involvement.

Advances towards a national rail policy and funding framework were more modest in the federal Safe, Accountable, Flexible, and Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)[2] than many had hoped for. However, there is a growing recognition that multistate coalitions and the federal government will play a role in the future of the nation's rail system because the scale of the rail system transcends state boundaries. Recently, there has been emphasis in national transportation policy discussions of the need for a national rail policy to ensure that there is adequate investment to eliminate critical rail chokepoints and add needed capacity. The emphasis has increased as states have considered the difficulties of accommodating more truck traffic on highways and as shippers and motor carriers face increased fuel costs and labor shortages.

WSDOT is very active with the Federal Railroad Administration (FRA) in the development of the mandated National Rail Plan. This participation at the national level will enable the state to influence the plan development so that the state's needs are supported as well as the corridors and markets that are connected to the state's economy.

[2] SAFETEA-LU was the federal surface transportation authorization act that provides federal funding to state transportation agencies. SAFETEA-LU was enacted in 2005 and expired in 2009.

Current Funding Sources

State

The state provides several funding sources for priority freight rail investment projects that provide statewide public benefits. They are described by agency below.

Each of these agencies has knowledgeable and effective staff, and each carries out its mandates effectively; however, the lack of a central point of contact and coordination makes it difficult for businesses, communities, and the railroads to deal with the state, and in some cases, weakens the state's negotiating position.

Washington State Department of Transportation

WSDOT has the following funding programs:

Freight Rail Investment Bank Program

This grant program is managed by the State Rail and Marine Office. The Governor and legislature provided $5 million for the Freight Rail Investment Bank (Rail Bank) grant program for the 2009-2011 biennium. It is anticipated the Washington State Legislature will continue allocating $5 million for Rail Bank projects in the following biennia. The goal of the Rail Bank is to assist with the funding of smaller capital rail projects. Funds will be available for up to $250,000 and must be matched by at least 20 percent of funds from other sources.

The Governor and legislature expect these projects to be prioritized using the following priorities, in order of relative importance:

1. Economic, safety, or environmental advantages of freight movement by rail compared to alternative modes.
2. Self-sustaining economic development that creates family-wage jobs.
3. Preservation of transportation corridors that would otherwise be lost.
4. Increased access to efficient and cost-effective transport to market for the state's agricultural and industrial products.
5. Better integration and cooperation within the regional, national, and international systems of freight distribution.
6. Mitigation of impacts of increased rail traffic on communities.

Prior to 2009 the Rail Bank program was open to public sector participants only, participants such as publicly-owned railroads, port districts, rail districts, and local governments. However, in 2009 the legislature opened the loan program to eligible private sector organizations with projects that will further the state interest.

Eligible projects must have one or more of the following state benefits:

- Advance the state economic development goals.
- Leverage state participation by allocating cost responsibilities among beneficiaries.
- Demonstrate that there is a low likelihood of obtaining public benefits without public involvement.

Project examples include:

- Strategic multimodal consolidation centers. Project proponents to provide:
  - Service agreement from the BNSF Railway and/or the Union Pacific Railroad.
  - Volume commitment from shippers.
  - Business analysis of value offered.
- Rail rolling stock purchases (powered or unpowered).
- Intermodal transfer or transload facilities or terminals, including attached fixtures and equipment used exclusively for this facility.
- Terminals, yards, roadway buildings, fuel stations, or railroad wharves or docks, including attached fixtures and equipment used exclusively in the facility.
- Railroad signal, communication, or other operating systems, including components of such systems that must be installed on locomotives or other rolling stock.
- Siding track.
- Railroad grading or tunnel bore.
- Track including ties, rails, ballast, or other track material.
- Bridges, trestles, culverts, or other elevated or submerged structures.

Freight Rail Assistance Program

This is a grant program where the Washington State Legislature authorized WSDOT to provide grants to:

- Support branch lines and light density rail lines.
- Provide or improve rail access to ports.
- Maintain adequate mainline capacity.
- Preserve or restore rail corridors and infrastructure.

As required by Revised Code of Washington Chapter 47.76, projects must be shown to maintain or improve the freight rail system in the state and benefit the state's interests. Project proposals may be submitted if they include one or more of the following benefits to the state:

- Improve freight mobility.

- Increase economic development opportunities.
- Increase domestic and international trade.
- Preserve or add jobs.
- Reduce roadway maintenance and repair costs.
- Reduce traffic congestion.
- Improve port access.
- Enhance environmental protection.
- Enhance safety.
- Support economic viability of branch lines or light density lines.
- Maintain adequate mainline capacity.
- Preserve or restore rail corridors and infrastructure.

Project examples include:

- Rehabilitate tracks or restore tracks that were removed.
- Upgrade tracks to handle heavier rail cars and/or improve system velocity.
- Provide a rail connection to existing industries not currently served by rail.
- Develop rail infrastructure that can be proven essential to attract new businesses.
- Repair damaged rail infrastructure.
- Increase rail system capacity and/or velocity in general.
- Preserve a rail corridor.
- Improve connections to a port or transload facility.
- Construct transload or other facilities.
- Purchase or rehabilitate railroad equipment.

The Washington State Legislature has allocated $2.75 million for freight rail assistance projects in 2009-2011. The legislature will determine how those funds will be spent based upon the applications submitted through WSDOT. Appendix 8-B shows a list of historical and planned projects managed by WSDOT.

Two other boards that were created by the Washington State Legislature as mentioned in Chapter 6 are the Freight Mobility Strategic Investment Board (FMSIB) and Washington Community Economic Revitalization Board. Both agencies have grant programs for qualified projects.

Grain Train Revolving Fund

This revolving fund is a financially self-sustaining transportation program that supports Washington's farmers, short-line railroads, and rural economic development. The Washington State Grain Train Program operates without taxpayer subsidy. Operations of the Grain Train began in 1994 and it has grown to a 89-grain car fleet (71 are owned by the state,

and 18 are owned by the Port of Walla Walla). Currently, WSDOT is in the process of acquiring an additional 29 cars.

The grain train's day-to-day business operations support a unique revolving fund that pays for fleet expansion. It is an excellent example of a self-sustaining state financing model. The expansion financing is set up as follows:

- The grain shippers pay the railroads a haulage fee for the grain movement to the deepwater ports. The Class I railroads and the short lines share these haulage fees.
- The Class I railroads then pay the short line a "rental" fee for the use of the publically-owned grain hopper cars. These rental fees are deposited directly into the accounts managed by each of the three port districts; a portion of these funds are used for grain car maintenance, a portion is set aside for eventual car replacement (estimated 20-year life), and the rest is set aside and used as a "revolving' fund that is periodically tapped for fleet expansion.
- Once the revolving fund has grown large enough to purchase used grain hopper cars (a standard 26-car set plus three extras), a process is put into place to locate and purchase the said cars.

Federal

The funding sources described in this section are continuations of existing programs or were newly created by the SAFETEA-LU legislation. There had been high hopes that Congress would take a bolder stance on funding flexibility as part of the reauthorization process and allow funding of rail projects from highway provisions as was done for transit; however, this did not happen. There were successes, including the new provisions for Transportation Infrastructure Finance and Innovation Act (TIFIA) loans that allowed funding of freight projects. However, there continues to be a lack of diversity of funding sources for freight projects. This continues to be an obstacle to a major national funding program for rail. Highway agencies, much of the trucking industry, and portions of the construction industry are opposed to changing federal law to allow the Highway Trust Fund to be used for investments in non-highway projects, fearing that this will aggravate the current and expected shortfalls in investments in highways.

Another disappointing aspect of the 2005 federal surface transportation reauthorization process was the degree to which promising new programs were subject to project earmarks and how little discretion the USDOT was given in implementing these programs. This was particularly true of the National Corridor Infrastructure Improvement Program, the Projects of National and Regional Significance, and the Freight Intermodal

Distribution Pilot Grant Program. Almost all funds in those programs were earmarked by Congress to specific projects.

Nonetheless, the Federal Highway Administration (FHWA) is preparing regulations for these programs with the intent of influencing the character of the projects that were earmarked by Congress. While this might seem to be of little importance, it may still be beneficial for the state to comment on the regulations and to meet with the FHWA staff to influence the regulations for these programs and their future directions. This could set the stage for a more favorable outcome in the next reauthorization (as well as ensure that any project earmarks received by the state can be implemented consistent with the state's rail policies).

Congestion Mitigation and Air Quality Program

The Congestion Mitigation and Air Quality (CMAQ) Program was created in 1991 by the Intermodal Surface Transportation Efficiency Act. CMAQ was created to provide innovative funding for transportation projects that improve air quality and help achieve compliance with national air quality standards set forth by the Clean Air Act. CMAQ funds are often used for freight and passenger projects, including priority control systems for transit vehicles, intermodal facilities, rail track rehabilitation, and new rail sidings. CMAQ funds also can be used for construction activities that benefit private companies; if it can be shown that the project will improve air quality by removing trucks off the road. SAFETEA-LU provided $8.6 billion for the CMAQ program for the FY2006 through FY2009 period. The funds were fully allocated to the individual states. The state received approximately $153.241 million for FY2004 to FY2009.

Because CMAQ funds are allocated to states based on the population of local areas in the state that are in noncompliance, or seeking to maintain compliance with national standards for ozone and carbon monoxide, there is little that the state can do to increase its share. However, it can estimate its next CMAQ allotment and make plans for packaging funds with other sources to create the largest benefit to the rail system. Projects that will result in either maintaining or adding to the amount of traffic diverted from autos and trucks to rail would be particularly well suited for these funds.

Capital Grant Program for Rail Line Relocation and Improvement Projects

The Capital Grant Program for Rail Line Relocation and Improvement Projects was created under Section 9002 of SAFETEA-LU to fund local rail line relocation and improvement projects. States were eligible to receive grant funds from this program for the following types of rail projects:

- Rail line improvement projects serving the purpose of mitigating the impacts of rail traffic on safety, motor vehicle traffic flow, community quality of life, and/or economic development.
- Rail line relocation projects involving a lateral or vertical relocation of any portion of the rail line.

Section 9002 of SAFETEA-LU[3] authorized, but did not appropriate, $350 million per year for the FY2006 through FY2009 period. According to the grant allocation requirements slated under this program, at least 50 percent of the grant funds awarded under this program in a fiscal year must have been provided as grant awards, not to exceed $20 million each. The state or non-federal entity receiving the grant was required to pay at least 10 percent of the total cost of the project being funded by this grant program.

Projects of National and Regional Significance Program

The Projects of National and Regional Significance (PNRS) Program was created by Section 1301 of SAFETEA-LU to provide grant funds for high-cost projects of national or regional significance. Projects eligible for funding under this program included any surface transportation project authorized under 23 United States Code (USC) for assistance, including freight rail projects. In addition, projects must have had a total eligible project cost greater than or equal to the minimum of $500 million; or 75 percent of the total federal highway funds apportioned to the state where the project was located (in the most recent fiscal year). Federal shares for this program were generally 80 percent of total project cost.

Eligible project activities included development phase activities, right-of-way acquisition, construction, reconstruction, rehabilitation, environmental mitigation, construction contingencies, equipment acquisition, and operational improvements. Funds were allocated to projects based on a competitive evaluation process based on the ability of projects to satisfy criteria that included, but were not limited to, generating national economic benefits, reducing congestion, and improving transportation safety.

SAFETEA-LU authorized $1.602 billion for this program from FY2006 to FY2009. In the future, the state should consider positioning several of the larger rail infrastructure projects for PNRS funding, if available under the next transportation funding authorization. The state also should consider supporting projects under this program that are located in other states, but have significant benefits to this state.

[3] SAFETEA-LU authorization ended September 2009; no reauthorization has been passed at this time.

Freight Intermodal Distribution Pilot Grant Program

The Freight Intermodal Distribution Pilot Grant Program was created under Section 1306 of SAFETEA-LU to provide grant funds to states to facilitate and support the development of intermodal freight transportation initiatives at the state and local levels. This Pilot Grant program was for congestion reduction and safety enhancements, and to provide capital funds to address freight distribution and infrastructure needs at intermodal freight facilities and inland ports. This was a pilot program and Congress earmarked all the grant funds from this program, totaling $30 million, to five states (Alaska, California, Georgia, North Carolina, and Oregon) for six projects, with each project receiving $1 million for the five years from FY2005 through FY2009.

United States Department of Commerce Economic Development Administration Funds

The United States Department of Commerce's Economic Development Administration (EDA) provides grants for economic development projects in economically distressed industrial sites. A critical objective of the program is to promote job creation and/or retention in the region. Eligible projects must be located within an EDA-designated redevelopment area or economic development center. Freight-related projects that are eligible for funding from this program include industrial access roads, port development and expansion, and railroad spurs and sidings.

Evidence of the economic distress that the project is intended to alleviate is required of the grantees. The program provides grant assistance up to 50 percent of a project cost; however, it can provide up to 80 percent of cost for projects located in severely depressed areas. During the fiscal year 2008, the EDA awarded 146 grants for $281 million. EDA funds have been used as a funding source by at least one rail project in the state in the past.[4] This funding source should be considered for state rail improvement projects, such as industrial rail spurs and sidings in industrial areas, that can be shown to support employment growth and contribute to economic development.

U.S. Department of Agriculture Community Facilities Program

The U.S. Department of Agriculture Community Facilities Program provides three types of funding for the construction, enlargement, extension, or improvement of community facilities in rural areas and towns with a population of 20,000 or less. The three programs are:

[4] D St. Project in Tacoma, WA.

1. Direct Community Facility Loans.
2. Community Facility Loan Guarantees.
3. Community Facility Grant Program.

Grant assistance is available for up to 75 percent of project cost. Rail-related community facilities eligible for funding from this program include rail spurs serving industrial parks, and other railroad infrastructure in the region, such as yards, sidings, and mainline tracks.

The Community Facility Program amounted to $297 million in direct loans, $208 million in loan guarantees, and $17 million in grants for FY2007. The average loan, loan guarantee, and grant amounts are estimated to be $442,000, $860,000, and $32,000, respectively. This funding source could be used by the state for rail improvement projects in rural agricultural and industrial regions.

Produce Rail Car Program

This project, modeled on the successful Washington Grain Train project, provides refrigerated rail cars to help address the critical shortage of railcars for Washington farmers and agricultural shippers. These farmers and shippers need to move perishable commodities like fruit and vegetables to ports and other markets.

In 2001, the Washington State Potato Commission and Washington Potato & Onion Association proposed the program because rail-car shortages were becoming an annual problem for perishable product shippers.

Washington legislators passed a produce rail car law in 2003. Senator Murray secured $2 million in funding from the 2004 and 2005 omnibus appropriation bills to make this project fully operational.

Federal Rail Assistance Program

This is a state administered federal matching program for projects associated with light density rail lines that is currently not funded. The program was originally established in 1973 to provide financial assistance to states for the continuation of rail freight service on abandoned light density lines in the Northeast. The Railroad Revitalization and Regulatory Reform Act of 1976 expanded the program to all states and to lines threatened with abandonment. Funding for this program has not been re-authorized since 1989. However, some states used Local Rail Freight Assistance Program funds to create revolving loan programs, which permitted new loans to be made as existing loans were repaid.

Federal Loans and Tax Credits

The funding programs described in this section include both loans and credit enhancement programs. In the case of loans, a project sponsor borrows funds directly from a state Department of Transportation (DOT) or the federal government under the condition that the funds will be repaid. Credit enhancement involves the state DOT or the federal government making the funds available on a contingent, or standby, basis. An example of this is a TIFIA loan guarantee. This type of credit enhancement helped to reduce the risk to investors and, thus, allowed the project sponsor to borrow at lower interest rates.

Several loan and credit programs that can be used to finance freight rail projects at the state level were created or changed substantially in SAFETEA-LU. These include:

- The Railroad Rehabilitation and Investment Financing Program (RRIF), which saw a tenfold increase in funding, from $3.5 billion to $35 billion between 2000 and 2006.
- TIFIA, which widened the definition of eligible projects to include freight rail projects. Eligible projects included projects that improved/facilitated public or private freight rail facilities that provided benefits to highway users, intermodal freight transfer facilities, and port terminals and port access.
- Private Activity Bonds (PABs) were established as a new source of funding in SAFETEA-LU. This reauthorization of the surface transportation bill amended the Internal Revenue Service (IRS) code to allow use of PABs for highway and freight transfer facilities. PABs, otherwise known as tax-exempt facility bonds, were qualified bonds, which meant that interest on the bonds was excluded (not subject to income reporting) for federal income tax purposes in the gross income of recipients. With this qualified status and the resulting tax benefit to investors, exempt facility bonds was offered at lower interest rates, reducing the cost of financing projects for the bond issuer.

These three actions helped to widen the pool of funding available to freight rail projects. They are explained in greater detail below.

Railroad Rehabilitation and Investment Financing Program

Section 9003 of SAFETEA-LU amended the RRIF program, which was created originally under Section 7203 of the 1998 Transportation Equity Act for the 21st Century (TEA-21). The RRIF program, administered by the FRA, provided financial assistance in the form of direct loans and loan guarantees to eligible recipients for the following types of rail projects:

- Acquisition, improvement, or rehabilitation of freight (intermodal or carload) and passenger rail equipment and facilities, including tracks, yards, bridges, etc.
- Refinancing of outstanding debt incurred in the acquisition, improvement, or rehabilitation of freight and passenger rail equipment and facilities.
- Development of new freight and passenger rail facilities.

The RRIF program did not provide financial assistance for rail operating expenses. Recipients eligible for direct loans and/or loan guarantees from the program included public and private entities, railroads, joint ventures (including at least one railroad), limited-option freight shippers (e.g., shippers who owned a plant or facility served by no more than a single railroad), and interstate compacts consented to by Congress under Section 410(a) of the Amtrak Reform and Accountability Act of 1997. Thirteen loans, totaling $517 million, have been issued since 2002. The smallest and largest loans approved were $2.1 million for the Mount Hood Railroad and $233 million for the Dakota, Minnesota, and Eastern Railroad.

Direct loans from the program were used to finance 100 percent of the total project cost, while loan guarantees were made for up to 80 percent of the cost of a loan, for terms up to 35 years. The program required applicants to cover the subsidy costs through payment of a "credit risk premium" equal to a fraction of the loan amount calculated based on the financial viability of the applicant and the value of the collateral provided to secure the debt.

Transportation Infrastructure Finance and Innovation Act

TIFIA was created in 1998 by TEA-21. The strategic goal of this program was to leverage limited federal resources and stimulate private capital investment by providing credit assistance (up to one-third of the project cost) for major transportation investments of national or regional significance. The program had a project cost threshold for eligibility, which is the lower of $50 million or 33 percent of a state's annual federal-aid apportionment for highway projects.

SAFETEA-LU expanded TIFIA eligibility to certain private rail projects. Eligibility for freight facilities included the following:

- Public or private freight rail facilities providing benefits to highway users.
- Intermodal freight transfer facilities.
- Access to freight facilities and service improvements, including capital investments for Intelligent Transportation Systems.

- Port terminals, but only when related to surface transportation infrastructure modifications to facilitate intermodal interchange, transfer, and access into and out of the port.

The TIFIA credit program offered three distinct types of financial assistance: secured (direct) federal loans to project sponsors; loan guarantees by the federal government to institutional investors; and standby lines of credit in the form of contingent federal loans.

Federal credit assistance from this program could not exceed 33 percent of the total project cost. SAFETEA-LU authorized $122 million per year to pay the subsidy costs of supporting federal credit under TIFIA. There was no limit on amount of credit assistance that was provided to borrowers in a given fiscal year. Repayment of TIFIA loans came from tolls, user fees, or other dedicated revenue sources. As of July 2006, TIFIA assistance amounted to $3.2 billion, leveraging $13.2 billion of investment in 14 transportation projects.

TIFIA has been a promising funding source that should be reviewed for applicability by the state during authorization of the successor bill to SAFETEA-LU.

State Infrastructure Bank

The State Infrastructure Bank (SIB) program was started as a pilot program that was authorized under Section 350 of the National Highway System Designation Act of 1995 (NHS). SIBs are revolving infrastructure investment funds, which are established and administered by states and are eligible for capitalization with federal-aid highway apportionments and state funds. The purpose of SIBs is to provide innovative and flexible financial assistance to states for rail, highway, and transit projects in the form of loans and credit enhancements. The state should consider establishing an SIB. Financial assistance is available to public and private entities through SIBs. The assistance includes below market rate subordinate loans, interest rate buy-downs on third-party loans, loan guarantees, and line of credit. Law makers should be encouraged to include this program in reauthorization packages. The following federal transportation funds may be used to capitalize SIBs:

- **Highway Account.** Up to 10 percent of the federal-aid highway apportionments to the state for the NHS program, Surface Transportation Program, Highway Bridge Program, and the Equity Bonus.
- **Transit Account.** Up to 10 percent of the federal funds for transit capital projects under Urbanized Area Formula Grants, Capital Investment Grants, and Formula Grants for other than Urbanized Areas.

- **Rail Account.** Federal funds for rail capital projects under Subtitle V (Rail Programs) of Title 49 USC.

A state that sets up and uses an SIB is obliged to match the federal SIB capitalization funds on an 80 to 20 federal/non-federal basis. The exception is funds from the highway account, where a sliding-scale matching provision applies.

Railroad Track Maintenance Credit

The Railroad Track Maintenance Credit authorized under Section 45G of the IRS Code provides tax credits to qualified taxpayers for expenditures on railroad track maintenance on railroad tracks owned or leased by a Class II or a Class III railroad.

The amount of tax credit provided equals 50 percent of the qualified railroad track maintenance and rehabilitation expenditures. Qualified railroad track expenditures include all expenditures towards maintenance and rehabilitation of railroad track, including roadbed, bridges, and related track structures.

Eligible taxpayers qualifying for this credit include any Class II or Class III railroad, and any person transporting property on a Class II or a Class III railroad facility, or furnishing railroad-related property or services to a Class II or a Class III railroad on miles of track assigned to such person by the Class II or Class III railroad. The maximum credit allowed under this program is $3,500 per mile of railroad track owned or leased by an eligible taxpayer, or railroad track assigned to the eligible taxpayer by a Class II or a Class III railroad that owns or leases the railroad track. This credit program, which was released in 2004, was for a 3-year period from December 31, 2004 to December 31, 2007.

However, for eligible taxpayers not having enough taxable income to make full use of the credit, the credits can be carried forward for a 20-year period.

Ports

Ports have multiple external financing options. One of these is the ability to issue private activity bonds.

Private Activity Bonds (Tax Exempt Bonds)

Title XI Section 11143 of SAFETEA-LU amended Section 142(a) of the IRS Code to allow the issuance of tax-exempt private activity bonds for highway and freight transfer facilities. States and local governments were

allowed to issue tax-exempt bonds to finance highway and freight transfer facility projects sponsored by the private sector.

SAFETEA-LU included a cap of $15 billion on private activity bonds. Passage of the private activity bond legislation reflected the federal government's desire to increase private sector investment in U.S. transportation infrastructure. Providing private developers and operators with access to tax-exempt interest rates lowered the cost of capital significantly, enhancing investment prospects. Increasing the involvement of private investors in highway and freight projects also generated new sources of money, ideas, and efficiency.

A tax-exempt bond is an obligation issued by a state or local government, where the interest received by the investor is not taxable for federal income tax purposes. Because of the exception of federal income tax on the interest earned, these bonds have a lower cost of financing compared to taxable bonds. Section 11143 of SAFETEA-LU created a new type of exempt facility eligible to be financed with tax-exempt bonds—the qualified highway or surface freight transfer facility. The new type of exempt facility bonds could be used to finance certain projects for surface transportation, projects for certain international bridges or tunnels, or facilities to transfer freight from truck to rail or rail to truck, provided the project or facility received federal assistance. In general, the law limited the total amount of such bonds to $15 billion and directed the Secretary of Transportation to allocate this amount among qualified facilities.

Section 142(m) 1) defines "qualified highway or surface freight transfer facilities" as:

(A) Any surface transportation project that receives federal assistance under Title 23 USC (as in effect on August 10, 2005, the date of the enactment of Section 142(m));
(B) Any project for an international bridge or tunnel for which an international entity authorized under federal or state law is responsible and which receives federal assistance under Title 23 USC (as so in effect); or
(C) Any facility for the transfer of freight from truck to rail or rail to truck (including any temporary storage facilities directly related to such transfers) that receives federal assistance under Title 23 or Title 49 as so in effect.

Private

Other Funding Sources

The other source of funding for freight rail projects that must not be overlooked is investments by the railroads. In 2006 U.S. Class I freight railroads spent more than $8.3 billion laying new track, buying new equipment, and improving infrastructure. This was a 21 percent increase from 2005 and represented record levels of investment.[5] Much of this money went toward maintenance of existing facilities, but there was significant double-tracking and siding construction to expand freight rail capacity along several high-density routes.

The emergence of both the public and private sectors to enter into new partnerships, such as the Alameda Corridor in southern California and the Chicago Region Environmental and Transportation Efficiency (CREATE) project in Chicago, are the most likely scenario of the future funding for large-scale rail projects. Multistate coalitions, such as those pioneered by the I-95 Corridor Coalition with its Southeastern Rail Operations Study (SEROps), hold promise as models for how states and private freight railroads can work together in the future. AASHTO's new *Freight Bottom Line Report* is attempting to define directions for national rail freight policy, recognizing the need to define a national rail network and better understand the chokepoints in this network. Recent funding increases proposed for Amtrak and the strong role that a number of states have taken in intercity passenger rail also suggest directions for future public funding of the passenger rail system.

The state continues to take an aggressive position in promoting an appropriate role for the public sector in shaping the future of the private rail system. By clearly defining when and how the public sector should play a constructive role in partnership with the private sector to advance rail system goals, this state is a leader in the national rail policy discussion. By examining emerging directions in this national discussion, the state also can position itself effectively to take advantage of emerging funding opportunities and offer itself as a model for the rest of the nation. As growth in trade and passenger travel put increasing pressure on the state's rail system, the necessity of protecting, maintaining, and growing the system will be viewed as a crucial aspect of the state's economic well being.

[5] Association of American Railroads, "Major Freight Railroads to Invest $8.3 Billion in Infrastructure in 2006," March 16, 2006, retrieved from www.aar.org/Index.asp?NCID=3582.

Public-Private Partnerships

Public-Private Partnerships (PPP) are contractual agreements formed between a public agency and a private-sector entity that allow for greater private-sector participation in the delivery of transportation projects. Expanding the private-sector role allows the public agencies to tap private-sector technical, management, and financial resources in new ways to achieve certain public agency objectives, such as greater cost and schedule certainty, supplementation of in-house staff, innovative technology applications, specialized expertise, or access to private capital.

To address future capacity issues from the growth in freight, the freight railroads have indicated an interest in participating in PPPs that provide tangible benefits for both the public and private sectors. As referenced above, the Alameda corridor is an example of a PPP—it is a $2 billion, 20-mile rail expressway connecting the Ports of Los Angeles and Long Beach with rail yards near downtown Los Angeles. Some other successful freight rail related PPPs are:[6]

- **CREATE** – a $1.5 billion project to improve rail freight connections involving the state of Illinois, city of Chicago, and major freight and passenger railroads serving the region.
- **Heartland Corridor** – a $200 million multistate partnership with Norfolk Southern to increase the flow of goods between the East Coast and Chicago.
- **Reno Trench** – a multimillion-dollar project that separates trains running through downtown Reno, Nevada from motor vehicle traffic.

Strategies

State Rail and Marine Office actions should be guided by the general principles in the *Statewide Rail Capacity and System Needs Study* (2006). These principles should be followed when sufficient public benefits are identified to justify public participation in the preservation and improvement of the rail transportation system:

- **Emphasize operations and nonfinancial participation in projects before capital investment.** The state should give priority to preserving and improving rail transportation through leadership, planning, permitting, maintenance, and operations that leverage existing rail infrastructure and services rather than through capital investment.

[6] Association of American Railroads, "Public-Private Partnerships for Freight Rail Infrastructure Projects", February 2008.

- **Preserve and encourage competition.** Investment in one railroad's infrastructure can change the competitive balance among railroads to the detriment of the overall system. Before making an investment that directly benefits only one rail company, the state should conduct a comprehensive analysis of competitive impacts on other rail carriers and users.
- **Target actions to encourage private investment that advances the state's economic development goals.** State actions should influence railroad investment decisions so that rail improvements generate greater benefits to the state than could be achieved if the state did not invest.
- **Leverage state participation by allocating cost responsibility among beneficiaries.** The state should not invest in the private rail system unless the railroads and other beneficiaries participate in proportion to their benefits and risks.
- **Require projects to have viable business plans.** Funding from the state should be contingent upon demonstration that the project proponent has rail service and customer agreements in place in order to make the project financially viable.

Additional strategies that WSDOT should consider are:

- **Establish a State Infrastructure Bank.** Refer to page 8-24 for more information on the State Infrastructure Bank program.
- **Continue as a leader in the development of the National Rail Plan.** This leadership role is an important asset for the state as the development of the plan can be influenced to make sure that the final plan supports the needs of the state, the corridors that carry the state's cargo, as well as the markets that are the foundation for the state's economy.
- **Maximize the use of federal funding available through federal transportation funding programs**. This is especially true for intercity passenger rail and for multistate initiatives. Federal funding support for freight rail investments has traditionally been offered through a mixture of grants, loans, and credit enhancement programs.
- **Be active in the development of the authorization of the next surface transportation bill** advocating for programs that benefit Washington State' rail programs. Position WSDOT for any pilot projects that become available in the authorization, such as the state of Oregon involvement in the Freight Intermodal Distribution Pilot Grant Program under SAFETEA-LU.
- **Continue to engage the railroads in public-private partnerships**, with a goal of sustaining a freight and passenger rail system that provides benefits to both.

- **Remain active in regional and national rail issues, to ensure that state investments achieve maximum value, and to ensure that efficient access to and from the state is maintained.** States have been very effective at supporting and funding improvements on short-line railroads and funding spot improvements on Class I lines solely within their jurisdictions, but states have been less effective at funding corridor-scale rail improvements that cross state boundaries. The Class I railroads long ago reorganized themselves to invest and operate at the regional and national scale. The states and the federal government have not built comparable institutional mechanisms to plan, negotiate, and finance large multistate rail projects. WSDOT should pursue multistate projects that sufficiently benefit the state.
- **Strengthen coordination with state economic development agencies to ensure that rail investments are supporting and spurring the desired economic growth.** Evaluation of rail investments need to consider the type of business, so focus is placed on industries important to the state's current economy, or are targeted as important to sustain the state's future economy. These include, but are not limited to, agriculture, international trade, energy, and construction.
- **Continue to support maintenance and modernization of the rail system to enhance local freight and passenger rail service, when public benefits to the state, residents, and shippers can be demonstrated.** It also includes supporting new technologies, especially when those technologies support WSDOT long-term transportation goals.
- **Support investment in freight and passenger rail projects that enrich quality of life and support responsible environmental stewardship.** This includes projects that reduce transportation delays, improve transportation safety, improve air quality, reduce noise, and reduce other negative transportation impacts to communities.
- **Develop a strategy for passenger rail services in the state outside the intercity (Amtrak *Cascades*) and Sound Transit areas.** This would address the growing requests and needs and establish a methodology for integrating this into future rail plans.

Vision for Future Funding

For the state rail system to serve the many roles described in this plan, the system must be maintained and expanded when and where necessary. As the past has shown, leaving this funding responsibility to the private railroads alone may not result in a rail system that meets the needs of the state and the nation. These needs include the ability to compete in the global economy by improving the intermodal connectivity and assuring both public and private benefits to all stakeholders. The responsibility for funding the necessary investments for the rail system to serve both state

and interstate commerce should be shared, where appropriate, among the private railroads that own much of the rail infrastructure and the various levels of government.

There needs to be a stable, predictable funding partnership consisting of the railroads (including Amtrak), the federal government, and state government to invest in rail transportation. This is in parallel to funding mechanisms for other modes of transportation, such as highways, transit, and aviation. The state's investment policy supports sharing of project funding among the partners in relation to the benefits received. The share of funding for specific projects will differ based upon the specific type of investment and benefit attributes. The funding package must be developed on the demonstrated benefits received by all parties.

Federal

The enactment of PRIIA and ARRA are examples of the expansion of the federal role in this partnership. These two authorizations are examples of good models that should be expanded into the freight rail funding arena. These models would provide infusion of federal funding for freight rail investments that benefit interstate commerce, the environment, and the public. Funding infrastructure projects—such as the removal of network bottlenecks that impede interstate commerce, last mile access to ports of entry, and constructing rail-truck or rail-barge intermodal transfer facilities—have these interstate commerce and public benefits.

Funding from government should be dedicated and predictable so that rail investments can be adequately included in transportation plans and programs. New federal funding programs should be multi-year and not depend on annual appropriations from Congress. A dedicated, predictable funding source for future rail investments is needed at both the federal and state level. Continuing and supplementing state funding with a dedicated funding source for rail will provide an advantage to the state in the ability to leverage future federal aid as well as leverage longer-term commitments from the private railroads.

State

The current dependency on bi-annual appropriations from state government makes funding for longer-term rail investments difficult to predict. In addition, similar to capital program development for other modes, rail projects start as proposals and require planning and engineering during the early project development process in order to result in a specific project with detailed cost and schedule. A dedicated funding source needs to be indentified and implemented.

This plan contains the results of the survey of the rail industry's 20-year needs for freight-related infrastructure improvements and presents the WSDOT State Rail and Marine Office's rail investment strategy for freight rail infrastructure improvements. The strategy presented in Chapter 4 is intended as a guide for WSDOT in selecting future freight projects.

Freight rail investments identified in the rail needs survey total more than $2.0 billion over the next 20 years. The project sponsors as a whole have only identified committed funds for 10 percent of the total need. Thus, 90 percent of the $2 billion, or $1.8 billion, is needed to complete the funding packages of the identified projects. Many of the projects do not even have a targeted funding plan.

In addition,the listing is an underestimate of the total need, due to the fact that it does not include projects that are private in nature or are joint investments that benefit both freight and passenger service. It should be noted that the list does not include the cost of Mega projects, such as the crowning of Stampede Pass tunnel, or the investments required to develop the multistate national corridor from the Puget Sound to Chicago.

Traditionally, the state, through WSDOT's State Rail and Marine Office and FMSIB, has assisted the freight railroads in improving their infrastructure where there is a clear public benefit. Projects that improve the railroads' ability to divert truck traffic from overburdened highways, construct intermodal facilities, reduce vehicle emissions, and increase safety rail-highway crossings all have public benefits. Many rail investments have significant economic development benefits such as port access improvements. While many projects have public benefits, the rail freight infrastructure investments will continue to be a primary benefit to the railroads and their stakeholders and should be funded as such.

This rail plan recommends that the state continue to support freight rail infrastructure improvements that have demonstrated public benefit. Future federal funding programs to increase investment in freight service should also be implemented.

Summary

There are existing funding programs at the federal and state levels that provide some opportunity of funding freight rail projects. However, these programs are relatively small or narrowly focused, while there is a rapidly growing need to increase investment in rail transportation. The enactment of PRIIA is an excellent example of a multi-year authority for Amtrak and creates new federal funding programs for intercity passenger rail. PRIIA authorizes a rail passenger funding program for states to use to improve

and expand passenger rail service, similar to federally funded programs for other transportation modes. A comparable program for freight rail should be enacted at the federal level.

Additional investment from both public and private sources will be needed in the future to address existing freight rail infrastructure needs and allow for growth in freight rail systems to serve the economy.

Washington State Department of Transportation

Chapter 9: Challenges and Opportunities

The proceeding chapters of this plan have indentified and discussed a number of freight rail issues in Washington State (state). The majority of the issues concern rail capacity of the rail system and funding for the needed infrastructure improvements. The challenges are summarized below followed by an action plan formulated around the six goals that have been developed by the State Rail and Marine Office in conjunction with the State Freight Rail Advisory Committee (Advisory Committee).

Transportation Challenges

This chapter is developed as guidance for future Washington State Department of Transportation (WSDOT) actions. The following trends were taken into consideration:

Population Growth

The state's growth puts pressure on all aspects of the state's infrastructure, especially the transportation system. A growing population not only needs to move people, it also increases the economic activities required to support this growth and generates freight requirements to support this expanded population base. Thus, this population growth challenges our transportation capacity, with the demands to move people and goods.

Safety and Security

The state puts a high priority on the safety and security of its transportation system. However, as the demand for mobility grows, so does the incident of accidents. To this end, it is beneficial to move as much freight and people as economically feasible as possible on rail. As more goods and people are moved on our rail system, it will be even more important to retain the high level of safety and security the system currently achieves.

Preservation and Maintenance

As documented in earlier chapters there is a significant level of investment needed in the state rail system for both expansion and maintenance of the current system. It is mandatory that the system is kept up to modern standards, especially the supporting short lines. In addition, as rail corridors are abandoned or freight services suspended, it is important that the state plan for long-term preservation of these rail corridors and rights of way for future use.

Rail's Role in the State's Economy

A large part of the state's economy depends on freight for its competitiveness and growth. Freight-dependent sectors, in general, include agriculture, mining, construction, manufacturing, wholesale, retail, transportation, and warehousing. In 2008 freight-dependent sectors accounted for 33 percent of the state's Gross Domestic Product, 71 percent of business income, and 39 percent of the state's employment. These sectors will demand faster and more reliable transportation options in the future for both their employees and their freight. Significant increases in freight are forecast both for the state and nationally. Although trucks will continue to handle the majority of the freight, highway congestion, climate concerns, and energy costs will influence more freight to be moved by rail within the state.

Capacity Constraints in the Transportation System

The urban and interregional highway corridors are currently heavily congested during peak periods and are forecast to be increasingly congested over the next 20 years. Significant additional capacity is required at our ports to meet the future forecasts for international cargo flows. Freight rail capacity will have to grow to meet this demand, if the state wants to retain their competitive edge as a gateway to the Midwest and Upper East Coast of the United States.

Rising Cost of Transportation

Although the current economic downturn has resulted in a very competitive cost environment in which to provide transportation infrastructure, it is forecast that these costs will rise in the future. As energy costs rise and state revenues decline, transportation budgets are strained during the same time that capacity improvements are needed.

Energy Efficiency and Climate Change Concerns

The Governor's 2008 Climate Action Team – Transportation Implementation Working Group (Climate Team) identified that emissions from transportation related activities account for nearly half of the total greenhouse gas (GHG) emissions in the state. The Climate Team stated that achieving significant reductions related to GHG emissions is critical for the state and will require meeting the short- and long-term vehicle miles traveled benchmark. The challenge is compounded by the paradox that transportation funding is dependent on the gas tax, while the goal of the Climate Team is to reduce the amount of miles traveled. The ultimate goal is to build, operate, and maintain a transportation infrastructure that is efficient and effective at moving people and goods. To achieve this vision, the state must reexamine how investments in transportation infrastructure and services are made. The state needs to make funding decisions and

pursue revenue generating strategies that stimulate behaviors that support climate change solutions and discourage behaviors that contribute to the problem. One of the solutions recommended by the Governor's Climate Action Team is rail transportation, as it is one of the most energy-efficient ways to move people and goods along major corridors.

Balancing Transportation and Community Livability

The balance between transportation and community livability continues to be a challenge in this state. As demand for mobility of people and freight continues to increase and choices for locating new development in or near urban areas becomes more constrained, investing in rail creates an opportunity. Rail transportation can be the solution to meeting mobility needs while promoting and retaining livable communities.

Transportation Funding

The Governor has announced that there is a transportation funding crisis in this state. As mentioned above the state budget is under pressure from reduced revenues, not only from gas taxes but all general fund revenues. This is a challenge both for the state as it attempts to meet citizen and business needs, but also as it pursues funding from other sources that require matches from the state.

Transportation Opportunities: Implementation of the Plan

Economic Competitiveness and Viability

Goal: Support Washington's economic competitiveness and economic viability through strategic freight rail partnerships.

Next Steps:

- WSDOT's State Rail and Marine Office should prepare a "needs" analysis on the project list to determine which infrastructure improvements can be financially supported.
- The State Rail and Marine Office needs to lead the planning effort to integrate individual plans into a system plan by:
  - Working with the state's Metropolitan Planning Organizations (MPOs), Regional Transportation Planning Organizations (RTPOs), and tribes to integrate freight rail into future regional transportation plans.
  - Working with the Department of Commerce and Department of Agriculture to develop a coordinated economic development approach, including infrastructure funding options for economic viability programs, such as grain trains and produce rail cars.

  - Working with the federal government to get the Northern Tier route designated as a National Rail Corridor.
  - Developing a plan to eliminate bottlenecks and improve capacity and velocity inside and outside of the state. The office needs to work with public and private sector partners in states along the I-5 rail corridor as well as newly designated East/West national corridor.
  - Using the Advisory Committee to enhance communication with the railroads, ports, shippers, industry representatives, and local communities and coordinate activities at the regional, state, and national level on needed projects, programs, and policy decisions.
- The State Rail and Marine Office should create a Rail Data Center to improve the state capacity to develop and manage freight rail system information, research capacity, and data capacity that support federal and state decision making and policy development in freight rail, enhance state and local freight rail planning and statewide coordination, and evaluate funding priorities of freight rail development.
- State agencies need to increase awareness of freight rail, when appropriate, as a vital mode of transportation within the supply chain through a public education process coordinated with other freight partners.

Preservation

Goal: Preserve the ability of Washington's freight rail system to efficiently serve the needs of its customers.

Next Steps:

- WSDOT's State Rail and Marine Office should confirm the at-risk system components that can benefit from public support.
- The State Rail and Marine Office should support the efforts of Class I railroads to compete for state and federal funding for major capacity preservation projects, when appropriate.
- The state should provide financial assistance to short-line railroads to maintain and preserve essential rail lines and prevent abandonment, when appropriate.
- The state should lead the coordination of plans involving rail corridor maintenance and preservation, including the identification of funding strategies for implementation of these plans.
- State agencies should integrate freight rail system development, land use planning and policies, public-private partnerships, and funding strategies consistent with the state vision and policy goals to protect and grow freight mobility.

- The State Rail and Marine Office should work with ports and railroads to project the functionality and viability of existing port access connections between port terminals, intermodal rail yards, and mainline tracks.
- The State Rail and Marine Office should create criteria to be used to evaluate at-risk rail corridors for public investment.
- The State Rail and Marine Office should consider acquiring rail corridors scheduled for abandonment that have met public investment criteria and have the potential to be reactivated in the future.
- The State Rail and Marine Office should work with short-line and mainline railroads to enable compatible interim use of a rail corridor right of way (i.e. rail/trails) within statutory limits, until such time that the right of way is returned to active rail use.

Capacity

Goal: Facilitate freight rail system capacity increases to improve mobility, reduce congestion, and meet the growing needs of Washington's freight rail users, when economically justified.

Next Steps:

- The state should designate a single entity to coordinate and direct the state's participation in the preservation and improvement of the rail transportation system. This entity should have the authority to negotiate directly with the railroads.
- WSDOT's State Rail and Marine Office should develop a comprehensive strategy to increase the state's east/west and north/south rail capacity in partnership with Class I railroads, ports, communities, and the federal government.
- The State Rail and Marine Office should continue to pursue passenger rail funding for the north/south Interstate 5 (I-5) corridor at the federal level that either maintains or creates freight rail capacity, such as the American Recovery and Reinvestment Act of 2009 application for a dedicated high-speed rail corridor.
- The State Rail and Marine Office should develop a comprehensive strategy for the coordination and support of positive train control systems development within the state.
- WSDOT should develop data and information, through a Statewide Rail Information Center, for freight rail demand, rail capacity constraints, and capacity use information needed for statewide planning and operation to enhance freight capacity.
- The State Rail and Marine Office should continue pursuance of funding for a rail facility inventory to include assessments for location of rail facilities and condition of physical assets.

- The State Rail and Marine Office should provide technical assistance to public and private entities such as the Freight Mobility Strategic Investment Board, Puget Sound Regional Council, and local communities for evaluation and prioritization of freight rail projects.

Energy Efficiency and Environmental

Goal: Take advantage of freight rail's modal energy efficiency to reduce the negative environmental impact of freight movement in Washington.

Next Steps:

- WSDOT should implement rail projects that reduce truck traffic, when economically feasible.
- The state should encourage use of environmentally-friendly equipment to decrease fuel consumption and air emissions such as:
  - "Green" switching locomotives in port areas and other rail yards close to residential areas, including the use of locomotive anti-idling devices.
  - Technologies that reduce wheel/track friction.
- The state should assess the effects of climate change on the rail system and identify where weather and climate events can impact rail infrastructure and operation. The state should coordinate these findings with the capacity needs and prioritization of improvements.
- The Department of Ecology and the State Rail and Marine Office should provide assistance in evaluating benefits of reducing environmental emissions and energy savings of rail-mode based options in intermodal and multimodal transportation planning.

Safety and Security

Goal: Address the safety and security of the freight rail system and make enhancements, where appropriate.

Next Steps:

- The state should expand education outreach to new and existing stakeholder groups, such as working with railroads and other partners to reduce pedestrian trespassing through joint public awareness efforts.
- The state should continue to support safety improvements of rail-highway crossings, signal systems, rail lines, and rail facilities, through regulations and partnership.
- WSDOT should review best practices, consult with area experts, work with partners, and develop a list of temporary rail-highway grade crossing closures and alternative routes in the event of natural and man-made disasters.

- WSDOT's State Rail and Marine Office should work with partners to plan for rail safety measures and routing before, during, and after emergencies.
- The State Rail and Marine Office should support railroads, Amtrak, local law enforcement agencies, and others to identify and implement rail security measures based on guidance from existing federal law (PL 110-432), identifying partnerships and other funding sources to enhance rail system security.

Livable Communities

Goal: Encourage livable communities and family-wage jobs through freight rail system improvements.

Next Steps:

- The state should support strategic partnerships along the state's rail corridors that improve the quality of life for the state's citizens.
- The state should encourage rail partners to implement projects on the project list that would improve the livability of a community by reducing emissions and noise.
- The state should encourage rail partners to implement projects that provide wages and jobs for local economies and communities.
- The state should encourage rail partners to involve local communities in program planning and project implementation processes.
- The state should encourage private investment that advances state economic development goals.

Conclusion

The *Washington State 2010-2030 Freight Rail Plan* lays the foundation for an improved and sustainable freight rail system in the state by identifying a vision for the state's freight rail service and establishing goals, objectives, strategies, and actions to achieve that vision. This has been accomplished by working with various stakeholders, including the rail industry, rail advocates, ports, governments, elected officials, and many other concerned groups and individuals. This collaboration is essential to creating a vision that reflects the needs of the community and ultimately to having a responsive, efficient, and sustainable rail transportation network.

Dedicated investment by government and the private railroads will be required to reach these goals and accomplish all of the rail improvements identified in this plan.

My name is Allison Warner and I am a Wetland Ecologist, currently employed by the Tulalip Tribes. I live on Camano Island.

My concerns with the Millenium Bulk Export Coal Terminal are both local and regional and national. The irreversible and many un-mitigatable impacts to our regional economy, environment, and to irreplaceable resources are so wide-reaching and large in scope, it is impossible to conclude this project is in the public interest therefore the agencies must select a no-action alternative as the preferred alternative. because of proposed wetland impacts and aquatic impacts, the lead agencies must deny the permit as no public interest exists which would override the level of damaging impacts to the environment. The terminals merely provide a conduit for coal as an export product with many costs and very little benefits to Washington State

CUMULATIVE IMPACTS

The EIS cites 22 out of 23 Environmental Resource areas with adverse impact and potential for cumulative impacts. The EIS has inadequate mitigation measures to deal with the scale of the environmental impact. Many of these impacts have NO mitigation possible. the DEIS predicts 19 coal train accidents per year, impacts to Longview's economy and reputation due to coal dust and coal train traffic impacts, real estate values, loss of 48 acres of river estuary area, loss of monies invested in watershed and salmonid restoration, and increased emissions have no real mitigation proposed in the EIS.

NATIONAL, AND STATE IMPACTS

This is a federal project and as such NEPA requires evaluation of all on and off-site impacts of the project. If the analysis includes all onsite and offsite impacts of this project, it must be concluded that the no-action alternative is the preferred alternative. While the purpose and need, to provide a coal export terminal, may provide some economic benefit to those employed there, is not only directly opposed to our state and national interests, by sending coal to China so that we may further increase the CO2 in the atmosphere and be subject in Washington State to the returning particulant-polluted air (see Cliff Mass, UW climatologist blog dated July 7, 2012 http://cliffmass.blogspot.com/2012/07/asian-haze-is-not-gone.html; see also June 2, 2012 http://cliffmass.blogspot.com/2012/06/coal-trains-really-bad-idea.html); it also directly conflicts with regional economic growth and numerous State and regional economic studies and initiatives. It cannot be concluded that the national, regional and statewide impacts are outside the scope of this EIS in that they are a direct and predictable result of the permitting of this facility.

The EIS must consider the conflicts of this project to Statewide initiatives to bolster and sustain Washington’s agriculture economy, and Washington’ unique fisheries, with a special consideration of the location on the Columbia River and its proximity to the agriculturally important Columbia Basin agricultural export rail capacity, and as such must study the potential impacts on the local agricultural economy. The EIS documents several studies which show that the rail lines from Spokane to Pasco and

Pasco to Vancouver are already at capacity and cannot actually accomodate the proposed rail car increases needed by this project. The single commodity that is being "funneled" through Washington State is a direct conflict to our regional economy's use of the rail lines. This is a direct and forseeable impact from permitting of this facility and is un-mitigatable in any way that doesn't involved spending billions of taxpayer money in upgrading and improving rail transportation. The economic cumulative effects to local state and federal government expenditures for the foreseeable needed infrastructure improvements need to be evaluated, and were inadequately evaluated in the EIS .

Washington States' 270 million a year shellfish industries are already experiencing impacts from ocean acidification- resulting in State expenditures (on Nov 27, 2012, Governor Gregoire signed an executive order creating a 42 point program to address the dramatic situation http://www.kitsapsun.com/news/2012/nov/27/governor-calls-for-action-to-fight-acidification/#axzz2Ig4cqccm- November 27, 2011, Kitsap Sun) . This is just one of the many statewide initiatives that are in direct conflict with a permit to allow 44 million tons per year of coal be burned into our atmosphere- there is no national boundary for this issue. While we cannot prevent China from burning coal, we can decide it is not in the public interest to allow this US coal to be transported by rail and shipped there to be burned. This is an indirect environmental and economic impact to our environment that must be considered by the EIS. Upon signing the executive order, Gregoire said Washington State produces nearly 85 percent of the oysters, clams and mussels produced along the U.S. West Coast, including Alaska. The industry employs more than 3,200 people, directly and indirectly.

According to Jane Lubchenco, administrator of the National Oceanic and Atmospheric Administration, who joined the Governor at Tuesday's presentation, along with U.S. Reps. Norm Dicks, D-Belfair, and Brian Baird, D-Vancouver, the panel has produced a "remarkable report" that could serve as a "beacon" for national action.

"Nowhere on the planet is a local response more urgently needed than here in Washington," Lubchenco said. "Ocean acidification is already affecting Puget Sound and Hood Canal."

The EIS inadequately evaluates the effects of burning of coal shipped due to the permitting of this project and cumulatively of the other terminals if permitted on the WA state shellfish industry. Include in this analysis losses of public expenditures such as the $3 million invested with this program to help shellfish hatcheries adapt to more acidic conditions and establishing a new center for ocean acidification at the University of Washington.

Climate change:

"From SEPA: "The agency perspective should be that each generation is, in effect, a trustee of the environment for succeeding generations. Particular attention should be given to the possibility of foreclosing future options by implementing the proposal." SEPA, WAC sec. 197-11-440(5)(c)(vii)

Therefore, through a cumulative analysis for the proposed MBT, determine the total amount of CO2 emissions that would result from the mining, transport by rail, export by cargo ship, and burning of 44million tons of Powder River Basin coal over the life of the project. How will all these emissions impact

and accelerate climate changes in Washington state? In particular, what will be the impacts on the glaciers of the North Cascades, on ocean acidification that is detrimental to marine ecosystems and shellfish, on precipitation that contributes to river and stream flow in the summer months that is crucial to salmon and agriculture?" ***I would add that this is one of the key reasons that the EIS must do a cumulative impacts analysis of ALL of the proposed terminals.***

"What are the projections for extreme weather events in Washington that may increase due to the possible burning of coal that might be exported from Cherry Point and Longview? (***And the other export terminals***)What would be the projected economic impacts due to climate change-induced extreme weather events like landslides in the winter due to greater than normal precipitation or drought in the summer due to a decrease in precipitation in our state?

"How much would the burning of the Powder River Basin coal in Asia that is proposed to be exported from the Longview Terminal offset the goals established by Washington State to reduce greenhouse gas emissions as adopted by our state legislature in 2008?

"Washington State adopted greenhouse gas reduction standards via legislation adopted in 2008. (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." (James Wells, Don't Pee In The Pool!, January 5, 2013)" ***Allowing this terminal to be built is in direct conflict to this state goal, and will result in a loss of public expenditures to achieve those goals, and in enacting the above legislation. Finally I agree with her request of the agencies to "***do a rigorous cumulative analysis of CO2 emissions from the GPT as well as the four other coal export terminals that are being proposed in Washington and Oregon. What would be the overall climate change effects due to burning approximately 150 million tons of coal over the life of the proposed export terminals?"

The EIS inadequately considers Carbon Dioxide (CO2) and other pollutant emissions from the coal at its point of combustion in Asia. The agencies must consider the impacts from this forseeable and unavoidable impact of the project on WA economy and environment (shelffish industry, etc)

The plan is to export over 48 million metric tons of coal per year to China, where it will be burned, resulting in air pollution that will cause impacts in the United States (in addition to the effects on nearby populations in China). The pollution includes carbon dioxide (CO2), a greenhouse gas that also causes ocean acidification. [The combustion also releases harmful pollutants such as mercury, but this comment is focused on CO2]

In public discourse, we have repeatedly heard a defeatist and misleading suggestion that people in China will just acquire coal from elsewhere, dug out of mines that do not currently exist, and burn that coal instead, if we do not export coal to them. That may or may not occur. If it does, that other coal will cost them more than importing coal from the USA, and thus they would probably use less. But in all cases it's never morally acceptable to be part of something harmful on the theory that someone else, somewhere else, is going to do it anyway.

Broadly, in permitting activities, agencies are required to evaluate an activity for the entirety of what it is, not as compared to some imaginary other circumstance that may or may not occur. This particular coal, if shipped to Asia to be burned, will create the pollutants. If not, then those pollutant emissions will not occur at that place and time. Therefore the full effects should be considered.

One regulatory question is whether the applicable law allows for consideration of an effect that may occur outside the US. The clear answer: Yes it can. It's right in 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 originate overseas.

PUBLIC INTEREST

A key consideration is the concept of the Public Interest. The agencies should broadly consider the public interest in this case, because the project needs to use government resources rather than just private assets. The effect of greenhouse gas emissions is relevant to public interest, because global warming and ocean acidification represent a very serious threat to our environment and the livability of our planet, and specifically to Washington State's economy.

In the case of Millenium Bulk terminal, there are at least three major government-controlled resources that are required for the project to go forward:

- The pier requires a shoreline lease from the WA State Department of Natural Resources - The coal is mined from federal government land in Montana and Wyoming

- Large water withdrawals from the Columbia River are needed for dust control and other purposes

This request to use government resources is profoundly different from meeting regulatory requirements for an activity on private land. The applicants have no title to the government resources, and so for access to be granted, the proposed activity needs to be in the public interest. This is especially applicable to the waters of the state due to the Public Trust Doctrine, as explained on the WA Department of Ecology web site: "The essence of the [Public Trust] doctrine is that the waters of the state are a public resource owned by and available to all citizens equally for the purposes of navigation, conducting commerce, fishing, recreation and similar uses and that this trust is not invalidated by private ownership of the underlying land."

In another example, leases 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. No export terminal should be permitted prior to conducting a complete review of the basis for the lease to mine the subject coal, and coal whose lease was justified on the theory of providing for domestic energy supplies should not be allowed to be exported.

The MBT project will also require exercise of a key government power, which is: Eminent Domain. This means seizing land from other private owners, whether or not they want to sell, in order to allow the project to occur. This is another point whether the question of the Public Interest is applicable.

The project is also inconsistent with certain federal or state laws or policies.

- Copenhagen Accord

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 schemes are clearly inconsistent with the intent of the document.

- EPA has Recognized CO2 as a Pollutant

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

- WA State GHG Reduction Standards

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. The coal terminal, if permitted, would emit tens of millions of metric tons of CO2 per year, wiping all of those reductions, and more. Since CO2 is a global pollutant, it would be futile to reduce local emissions while facilitating an increase elsewhere. [For reference, all GHG emissions in all of WA state are about 100 million metric tons / year]

- WA State Panel on Ocean Acidification

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.”

- SEPA Standards

The SEPA standard itself recognizes the world-wide scope of environmental issues.

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- SEPA Standards

The SEPA standard itself recognizes the world-wide scope of environmental issues. 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).)

LOCAL IMPACTS

- Coal Dust Impacts-

Of all the impacts other than the CO2 generated by the rail transport transport and operations of the MBT, and by the burning of the fossil fuel exported by the proposed terminal, the impacts by dust emissions during handling and transfer of coal related to rail unloading, ship loading, conveyor transfer, coal pile development and removal and wind erosion of coal piles is one of the most significant, irreversible, and truly unmitigatable impact of all the reasonably foreseeable and unavoidable impacts of the project. The EIS finds insignificant the coal dust problem, where other places with open coal dust piles, coal dust coats neighbor's homes, cars and boats and the water quality is bad. Lots of studies beyond those examined by the project exist (see *The True Cost of Coal, the Coal Industries Threat to Fish and Communities in the Pacific Northwest*- National Wildlife Federation, 2015 [attached]) and the physical example of other existing coal export facilities can be reviewed by the proponents to show that the waters and aquatic bed surrounding these existing facilities are impacted by coal dust, negatively affecting light penetration and growth of algae and bottom dwelling plants and animals, and negatively impacting juvenile salmonids and other fish. BNSF itself indicates it can't reduce coal dust emission levels during rail transport below 85% reduction in transit (See attached: Coal Train Facts, BNSF Customer Fact Sheet Coal dust Frequently asked questions). A highly optimistic statistic of 95% reduction in dust emission due to standard operating procedures and mitigation measures., was assumed at the export terminal site, which seems ludicrous in how small a number. The EIS states that 9.86 tons (19,728 lbs) of coal dust will be emitted at the site due to handling and transfer of coal related to rail unloading, ship loading, conveyor transfer, coal pile development and removal and wind erosion of coal piles . This is less than a millionth of the coal to be exported. The EIS does not indicate how it arrived at the exceedingly low figure it gives per year, which it then converts to 1.88 grams per square meter at the site, with no explanation as to how it arrived at this minimal impact. . It is reasonably foreseeable that this toxic black sediment, deposited at the site would accumulate X per year given river

flow and transport from the site. The EIS should have given the river miles expected to be impacted, and the size of the impact area by this 19780 lbs annually, and how far downstream the currents as well as winds will take this impact. They assume only 300 feet offsite for an impact area, which is laughable. The BE for a take determination on federally listed salmonids usually require a downstream sedimentation impact area from any instream work. There are other studies that have been used for sediment transport as well. The EIS states only that it was unable to determine impacts on aquatic resources and will rely on the US Geological Survey study yet to be published for its final EIS. This is entirely unacceptable as there are other studies cited in the attached National Wildlife Federation (NWF) publication addressing impacts to fish and fish habitat. While the EPA's cited 2005 study states that all of the chemical constituents would be bioavailable, the use of the study to show the project "would not exceed ecological soil screening levels for plants, soil invertebrates, avian wildlife or mammalian wildlife" does not seem to account for an irreversible smothering impact in the impact area with a continuing annual impact of additional 9.86 tons to the year 2038, and it does not discuss the impacts within the river and how far it would be carried by currents downstream, but only says it would be spread out over an area of 3 million square meters (despite assuming an impact of only 300 feet downstream), which would not cause a "measurable" change . The impacts of deposition of 9.86 tons of coal dust annually at the site on the Columbia River, a free flowing river estuary and at the confluence of the Cowlitz River must be considered when weighing the impacts of the project vs any potential benefits from the project. These impacts should include the loss of vast sums of money spent on restoration of river and salmonid aquatic habitats in Washington State, the City of Cowlitz and affected watersheds, and on the Columbia River.

The EIS did not discuss impacts to surrounding aquatic bed and water pH, but only says that Barium would precipitate as Barium sulfate- the study didn't seem to examine the impact to the river bed and surrounding area of a layer of coal covering the bed as a suitable medium for plants and animals to thrive (despite the "bioavailability" of its chemicals- if it makes the river bed extremely acid, nothing can grow or thrive). No other coal export terminal impacts were cited or reviewed by the EIS and should be for final EIS. The EIS makes a pitiful show of addressing the "coal dust" issue without addressing the real issue of the unmitigatable impact to the surrounding aquatic bed and how far this impact will extend due to river currents. Lots of other coal export terminals exist to use as comparison, most closely the British Columbia export terminal near Tswassen, BC, which was studied most recently in 2006 and cited in the attached NWF publication. This EIS fails to address the increased coastal and riparian and marine habitat degradation from coal dust impacts and should be sent back to the drawing board for further analysis. If the US Geological Survey is unavailable, it must be stated that the EIS simply fails to adequately analyze this issue. The study area for Water Quality impacts was considered only 300 feet downstream of the project area, which is laughable, and wholly inadequate considering the size of the Columbia River and its flow of up to 864,000 cfs.

WILDLIFE AND WETLAND IMPACTS

The EIS is wholly inadequate in its evaluation of impacts to plants and wildlife and wetlands at the project site The EIS says it will reduce coal dust by 95%, but for impacts on fish, wildlife and plants, its only mitigation measure suggested is to monitor and reduce coal dust. How the MBT intends to further

reduce coal dust is not offered and therefore this cannot be considered to be an adequate mitigation measure. The EIS also says it will conduct surveys for rare plants and aquatic plants prior to construction and "plan to reduce impacts" if any are found. The survey for rare and aquatic plants and animal species should be conducted prior to permitting of the project so that any impacts may be disclosed and evaluated as part of the EIS. This is not a reasonable mitigation that could lead to a MDNS. No consideration is given to coal dust impacts to the remaining 62+ acres of wetlands at the site due to smothering (which could be considered another method of "fill"), changes in pH(increased acidity), nutrient status, in the EIS. The importance of the wetlands at this location adjacent to the Columbia river in providing water storage during lower flow times and during flood stages and the loss of floodplain function at this site is not considered by the EIS, as well as the water quality impacts of water seeping into the Columbia via groundwater recharge from the adjacent remaining wetlands. The EIS ridiculously asserts no significant unavoidable adverse impacts from the project. Impacts to the remaining 62 acres of wetlands adjacent to a major river estuary being converted to a major dirty polluted industrial site is not insignificant, especially since the EIS has not identified a suitable mitigation site that could adequately replace the existing wetlands.

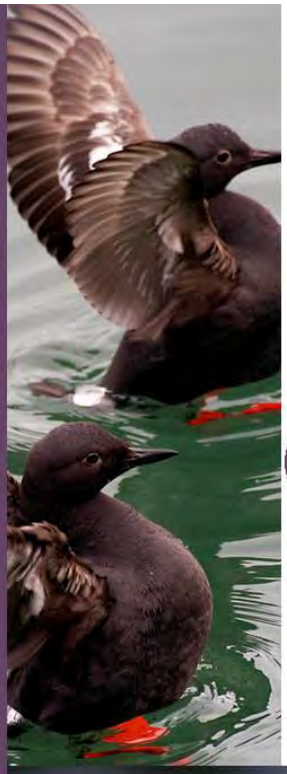
TRAFFIC IMPACTS

With 16, mile long trains each day, the proposed coal project has the potential to snarl local traffic and increase air pollution. Pollution from open coal cars and open piles will harm the community and cannot realistically be mitigated.
Any infrastructure improvements necessary to facilitate coal trains — such as the proposed SR 432 re-alignment project and a new overpass at the foot of the Lewis & Clark Bridge — should be part of the EIS review. Without major changes, coal trains would make
traffic unbearable in Longview.

The EIS should have evaluated the cumulative impacts of coal trains in communities like Camas, Washougal, Vancouver, Spokane, Seattle, and the Tri-Cities that could see train traffic from multiple coal export terminals.

The EIS should evaluate the human health impact of coal exports on Longview from coal dust and diesel pollution, and should assess how toxic coal will impact the Columbia River.

Audubon WASHINGTON



State of the Birds

2009







Birds & Climate Change: Washington's Birds at Risk



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Audubon WASHINGTON

Washington Birds and Climate Change

Introduction

Birds and climate change

Birds are sensitive barometers of their environment. As climate change brings about changes in temperature, precipitation, wildfire behavior, and weather extremes, birds are already responding to these new conditions. As did canaries in coal mines, birds now alert us to environmental changes to which we need to pay attention.

Global climate change is an issue that is increasingly taking center stage in discussions of conservation threats. The interaction of all the effects of climate change are likely to be complex, making outcomes difficult to predict. The impacts, whether positive or negative, will extend to every ecosystem and every creature on the planet, changing some in profound ways. We are faced with decisions today that could have pronounced affects on our children and grandchildren, their quality of life, and the health of the planet that surrounds them.

Public debate on the climate change issue has shifted from *will it happen* to *how will it happen*. Scientists agree that our climate is changing, and all but a tiny minority concur that human activities are an important factor driving the climate change. For many groups of plants and animals, including birds, studies are already showing changes in behavior and shifts in distribution in response to climate change.

The material presented here focuses on the projected impacts of climate change on Washington's birds. This discussion draws on the small amount of literature specifically addressing Washington's avifauna, and, more widely on the larger group of studies discussing birds in the Pacific Northwest, the Arctic, the Neotropics, and North America. Anyone wishing to delve deeper into these issues or the background materials for this report is referred to the References/Resources section at the end of this document.

Why are birds at risk?

Research has already demonstrated that some species of birds are being negatively affected by climate change. For example, the recently released IUCN Red List assessment for birds found that climate change is accelerating many of the factors that have put one in eight of the world's birds at risk of extinction. The most injurious effects of climate change, and the ones hardest to predict, may come about because climate change interacts with other ongoing threats, such as habitat loss.

The direct effects of climate change on birds include loss of critical habitat, behavior, distribution, population dynamics, and phenology (the timing of key life history events); many of these effects are driven by changes in precipitation and temperature. Overall, climate change is expected to lead to significant range changes for many of our bird species.

Indirect effects of climate change on birds include sea level rise, changes in fire regimes, vegetation changes, land use changes, altered competitive interactions among species, and ecosystem reordering. Birds most at risk from habitat loss are those that are specialized in their habitat needs – including those species that are restricted to islands, alpine zones, or coastal beaches for critical parts of their life history.[i]

This site explores these topics, linking climate change to the Washington birds that could be most severely impacted.

To read more about the specifics of climate change, visit the following sites:

The Intergovernmental Panel on Climate Change shared the Nobel Peace Prize with Al Gore in 2008 for their landmark work to assess and publicize climate change.

The Climate Impacts Group focuses their research on the Pacific Northwest. In additional to technical information, the group has some digestible summary information for general reading.



Figure 1. Beach-nesting species like the Endangered Western Snowy Plover are likely to suffer disproportionately from the effects of rapid sea-level rise. USFWS photo.

Climate Solutions, a non-profit based in Washington, seeks viable solutions to climate change driven problems. They have an easy-to-read FAQ page.

Sea Level Rise

One of climate change's indirect effects is a rise in sea level. This rise has already been detected, but is expected to accelerate as polar ice caps and the world's glaciers shrink. Global average sea level is projected to rise 3.5"-to-35" between 1990 and 2100[ii]. Regional sea level rise will differ from the global average depending on factors such as changes in atmospheric weather patterns, tectonic processes, and regional differences in thermal expansion rates of ocean water.

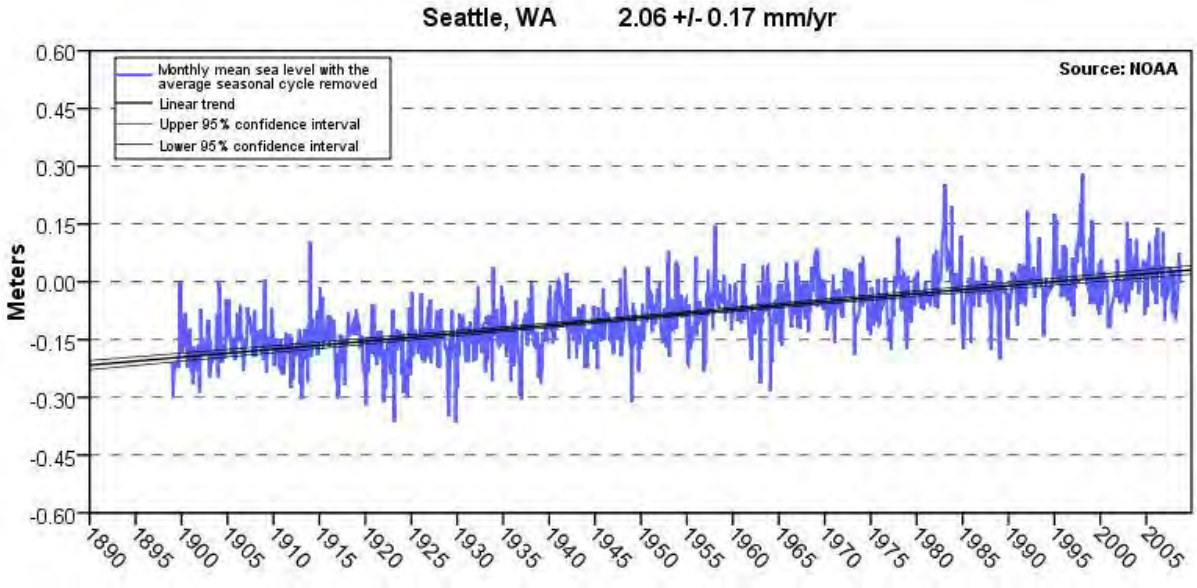


Figure 2. The plot shows the monthly mean sea level at Seattle (dashed curve), a 5-month average (solid curve), and the linear trend with its 95% confidence interval which was obtained after accounting for the average seasonal cycle. http://tidesandcurrents.noaa.gov/sltrends/sltrends_station.shtml?stnid=9447130, December 12, 2008.

Sea-level rise is expected to affect parts of the Northwest coast, causing permanent inundation in low-lying areas. The mean sea level trend from 1898 to 1999 at Seattle is a rise of 2.11 millimeters/year (0.69 feet/century)[iii].

Relative land motion is currently downward due to tectonic activity (e.g., Olympia), increasing the severity of sea level rise. Impacts include accelerated erosion at the base of bluffs and along the coast, shrinking wetlands, loss of sandy beaches to erosion, and reduced mud flats for foraging and resting birds. Other changes may include more landslides (if winters are wetter, as predicted).[iv]



Figure 3. Increasing sea level may threaten human and animal habitat. Computer graphic shows with a 3 m (~10 ft.) rise in sea level (note this level is three times the "worst case" rise estimated for this century, because GIS data with 1 foot elevational resolution were not available).[v]

Without an extensive coastal plain (as one finds in the Southeast US), Washington's coastal marsh habitat is likely to be subjected to "coastal squeeze." As rising seas levels inundate estuaries and river deltas, natural and man-made barriers such as cliffs, steep land morphology, hard sea defenses (e.g., dikes), and agricultural or urban land will form barriers against the natural retreat of these habitats up shore[vi].

Waders and shorebirds would be disproportionately affected by this change. While Washington provides some breeding habitat for these birds, arguably the state's most critical role for these birds is the support this habitat provides for millions of migrants. The Threatened Western Snowy Plover currently nests on Washington beaches, where its persistence is already tenuous. Other key species threatened by degradation or loss of coastal wetland habitats include Long-billed Curlew, Red Knot, Black Oystercatcher, Whimbrel, Marbled Godwit, Ruddy Turnstone, Black Turnstone, Surfbird, Sanderling, Rock Sandpiper, and Short-billed Dowitcher.



Figure 4. Where development encroaches on coastal beaches and marshes, rising sea levels may eliminate important bird habitat. Jeff Larson Photo.

Washington IBA species of concern at risk from sea level rise.		
Low Risk	**Moderate Risk**	**High Risk**
Black-bellied Plover	Semipalmated Plover	Snowy Plover
American Golden Plover	Wandering Tattler	Rock Sandpiper
Pacific Golden Plover	Black Turnstone	Short-billed Dowitcher
Greater Yellowlegs	Red Knot	
Lesser Yellowlegs	Sanderling	
Whimbrel	Long-billed Dowitcher	
Long-billed Curlew	Black Oystercatcher	
Marbled Godwit	Surfbird	
Ruddy Turnstone		
Semipalmated Sandpiper		
Western Sandpiper		
Least Sandpiper		
Baird's Sandpiper		
Pectoral Sandpiper		
Dunlin		

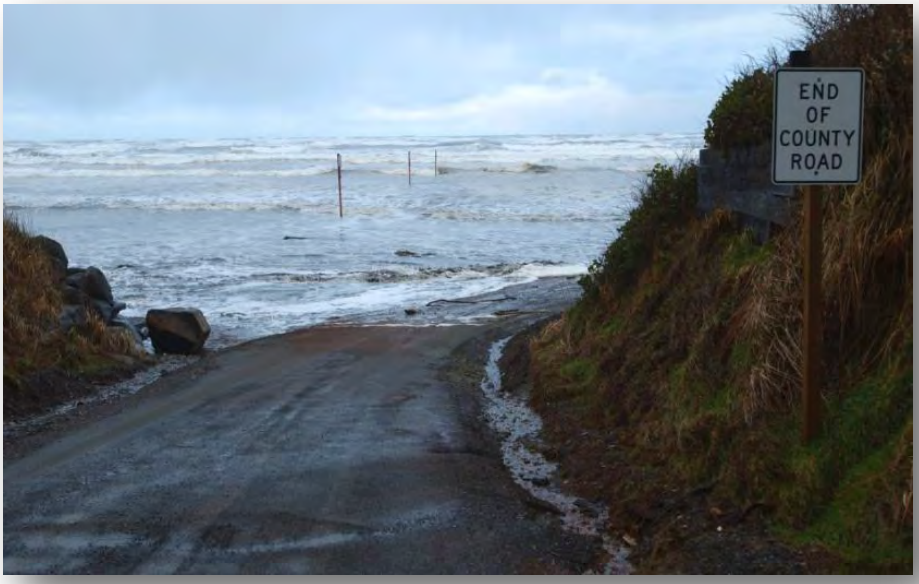


Figure 5. Rising sea level increases the risk of coastal flooding. (c) Jeff Larson.



Figure 6. Black Oystercatchers are at home in the tumultuous meeting place of rocks and waves. Such places could become rarer with sea level rise. © Jeff Larson.

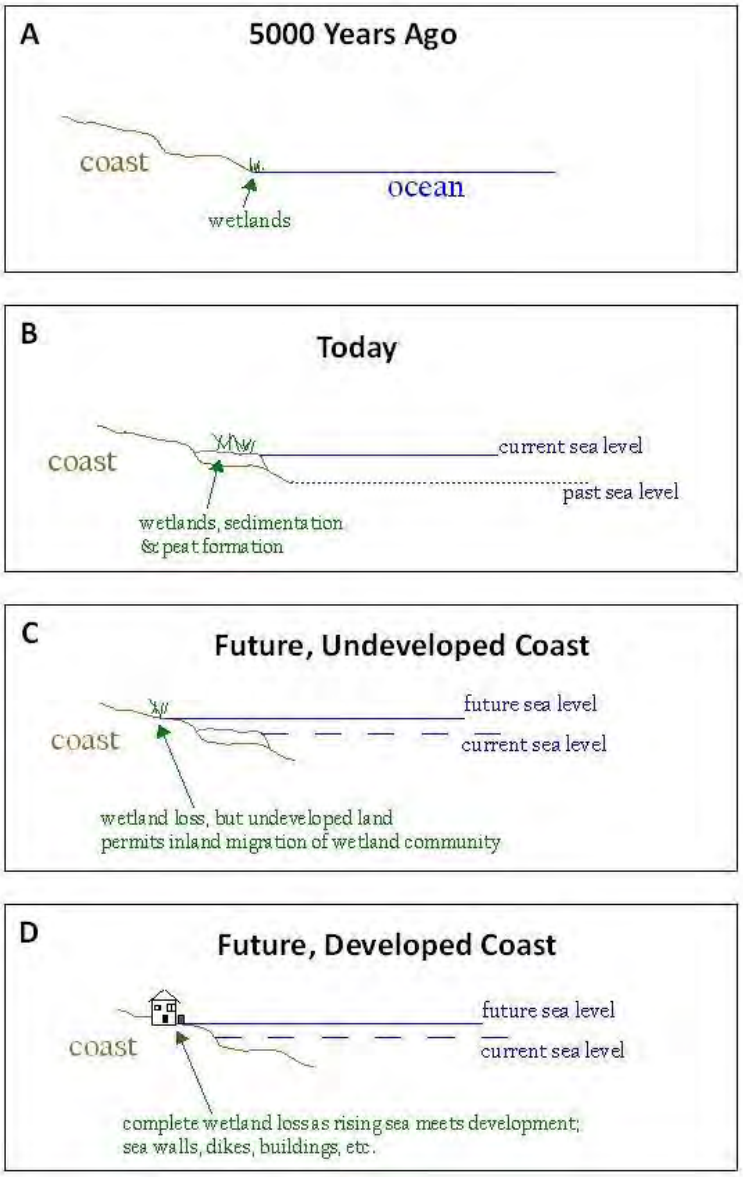


Figure 7. With the slow rate of historic sea level rise, coastal wetlands (A) have been able to move inland as sea level has risen (B). Thus, the area of wetlands increased as new lands were inundated. If in the future (C) sea level rises faster than the ability of the wetlands to keep pace, the wetland area will decline. Construction of bulkheads or dikes to protect developed areas (D) would prevent new wetlands from forming inland, resulting in a total loss in some areas. Source: Titus (1991).

Changes in Fire Regimes

Part of what makes climate change such a complex topic is that its effects are expected to interact with each other to create as-yet unforeseen problems. For example, climate change is expected to make conditions more favorable for weed invasions, which are likely to reduce habitat quality and food availability for native species, and increase the risk of fire in some vulnerable ecosystems. As these effects ripple through the ecosystem, fire altered landscapes become more vulnerable to erosion, reducing soil water retention and reducing water quality and quantity in streams and rivers that receive runoff.



Figure 8. Fire in the shrub-steppe community tends to lead to conversion from native to cheatgrass dominated habitat. ©D.E. McIvor/Hinterlands.

In the Columbia Basin shrub-steppe ecosystem (a northern extension of the Great Basin), one of Washington's most altered and threatened habitat types, fire and weeds act in unison to completely change plant and animal communities. Cheatgrass, an introduced annual from Eurasia, is particularly injurious in the shrub-steppe of the Columbia Basin, where it is widespread. Its success comes from the fact that it greens-up and reaches maturity before natives, "cheating" native grasses of valuable moisture. Each season while native grasses struggle to complete their life cycles, cheatgrass has already dropped seed and dried into highly combustible fuel. As natural or human-caused wildfires erupt, creating conditions that promote more cheatgrass. With more cheatgrass, the fire cycle occurs more frequently, until native plants cannot recover and ultimately disappear from the landscape. In this fashion, millions of acres of habitat continue to be permanently converted to cheatgrass, and lost as useful wildlife habitat or livestock range. It is this type of cycle, already severe, that climate change stands to make even worse.



Figure 9. Sage-grouse live only in the shrub-steppe biome, North America's most critically threatened ecosystem. ©D.E. McIvor/Hinterlands.

Washington IBA species of concern at risk from increased range fire frequency and intensity.		
Low Risk	**Moderate Risk**	**High Risk**
	Swainson's Hawk	Greater Sage Grouse
	Prairie Falcon	Ferruginous Hawk
	Burrowing Owl	Sharp-tailed Grouse
	Short-eared Owl	Sage Thrasher
	Loggerhead Shrike	Sage Sparrow
	Grasshopper Sparrow	Brewer's Sparrow

Fires are also predicted to become more frequent, greater in intensity, and larger in extent in Washington's forested ecosystems. This cycle will be driven by faster plant growth (longer growing season with more carbon available to plants), drier fire season conditions (earlier snowmelt, less summer rainfall), and increasing insect infestations. Already areas from the Intermountain West to the Cascades have seen epidemic outbreaks of pine bark beetles. These natural pests were once kept in check by the kind of deep winter cold that has not been experienced in this region for decades. As these beetles spread throughout the forest they kill their hosts, leaving thousands of acres of standing dead and highly flammable trees.



Figure 10. Intense wildfire swept through this conifer forest bordering shrub-steppe. The fire was so intense it sterilized the soil in many places, requiring human intervention to spread desirable plant seeds to recover the site. ©D.E. McIvor/Hinterlands.

Washington IBA species potentially impacted by increased forest fire intensity.			
Beneficial	**Low Risk**	**Moderate Risk**	**High Risk**
Black-backed Woodpecker	Sooty Grouse	Northern Goshawk	Flammulated Owl
Olive-sided Flycatcher	Williamson's Sapsucker	Dusky Grouse	
		White-headed Woodpecker	
		Hermit Warbler	

Vegetation Changes

As a number of variables—especially precipitation and temperature—shift away from current conditions, the vegetation covering our landscapes and defining our ecosystems is also expected to change. Habitat, in turn, defines the suite of animals that can live and thrive there.

A number or researchers have been developing computer models to predict how vegetation can be expected to change as global warming proceeds. This is an active field of research and we can expect refinement of the complex models and an ever-improving understanding of how impacts may unfold.

One useful existing model is from the Mapped Atmosphere-Plant-Soil System (MAPPS) project. While fascinating, informative, and thought-provoking, one of the limitations of this model is that it is course, offering only 8 km resolution.

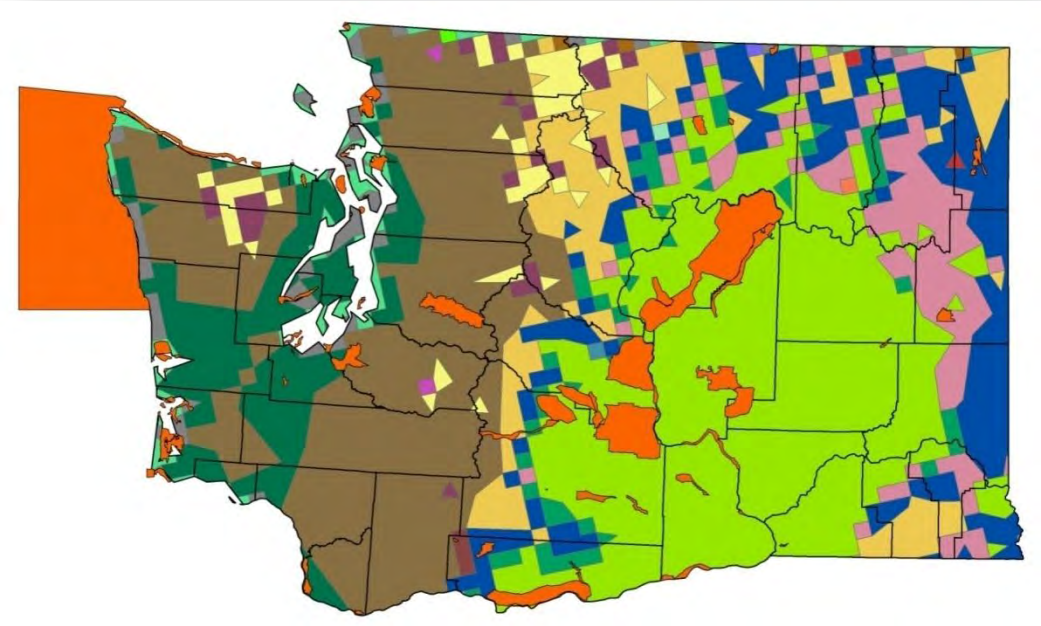


Figure 11. IBAs (shown in orange) projected over the MAPSS current vegetation model.

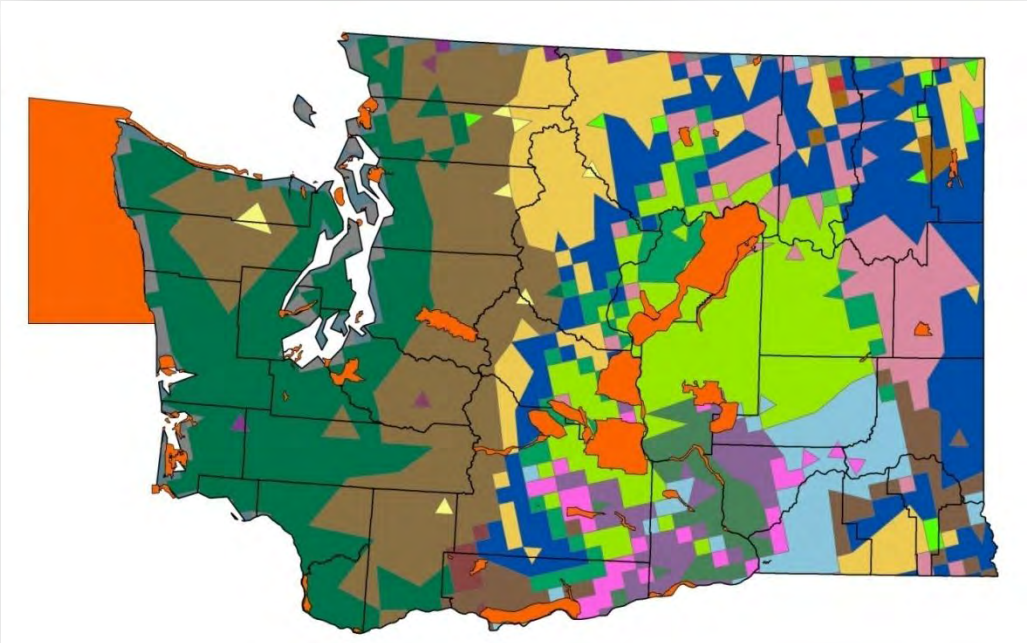


Figure 12. IBAs (in orange) projected against the MAPPS modeling of Canadian Climate Center data for predicted vegetation change in the years 2070 - 2099. The Canadian Climate Center model is based on doubling of atmospheric CO2 from 1961 - 1990 conditions.

Audubon Washington is just beginning to explore the implications of these possible vegetation changes for our IBAs. For example, in Figures 4 and 5, you can readily identify two large swatches of habitat—the montane/Cascades area shown in brown and the Columbia Basin/shrub-steppe region shown in lime green. Both of these regions shrink in extent under project climate change conditions, with the shrub-steppe becoming severely fragmented.

One challenge that IBAs, national parks, national forests, state parks and all public lands face is that their boundaries are fixed—drawn in hard lines on maps. With climate change, the vegetation that characterizes these landscapes appears likely to shift, possibly no longer occurring within our drawn boundaries, possibly no longer even occurring in the state. For example, the White-tailed Ptarmigan is a bird limited to the alpine regions of our state. This vegetation type is expected to move upward in elevation as temperatures warm. The ptarmigan will likewise move up in elevation until it runs out of "up," at which point its populations may become too small for the bird to persist in our state.

IBAs will almost certainly lose some of the species for which they were recognized. Whether these species will remain as residents of our state is a complex question dependent not only on vegetation, but also conditions on wintering grounds, predator-prey relationships, ecosystem reordering, and many other factors linked to climate change.

Many—if not all—bird species in Washington would be effected by such wide-scale vegetation changes. In the illustrations above, it is easy to recognize the grassland and shrub-steppe birds such as Greater Sage-Grouse, Sharp-tailed Grouse, Sage Sparrow, and Sage Thrasher are likely to be hard hit by habitat loss and fragmentation.

Changes in Precipitation and Temperature

Temperature affects birds both directly and indirectly. Birds are warm-blooded and must maintain a near-constant body temperature. With large flight muscles designed to rapidly convert energy into propelled flight, dissipating heat can be a significant challenge for birds. Furthermore, temperature influences the timing of migration. Birds are expected to shift their distributions either northward or upward in elevation to maintain optimum temperatures and to remain associated with their preferred habitats. Some species are adversely affected by temperature increases as small as 1°C and will face a difficult future if they cannot shift their range to respond to climate change.[vii] Temperature (in conjunction with precipitation), is likely to trigger the earlier departure of migrants from their wintering grounds.

Global climate models project mid- 21st century temperatures in the Pacific Northwest that are well outside the natural range of temperature observed in the 20th century. While the temperature in the Pacific Northwest increased at the rate of 0.08°C per decade over the past 100 years, temperature in the coming century is projected to increase at the average rate of 0.3°C per decade. Temperature increases occur across all seasons with the largest increases in summer.[viii]

For Washington's birds, temperature change is most likely to directly affect those species with limited ability to seek new ranges. This includes species that are already near the southern or altitudinal limit of their ranges. White-tailed Ptarmigan, a species of alpine zones, could be pushed from its mountain top ranges. This includes a population of ptarmigan near Mount Rainier, which is isolated from other Washington populations and may be genetically unique. Ptarmigans are not migrants and typically move only short distances during the year, so the likelihood that individuals would migrate northward is remote.

Gray-crowned Rosy-Finch, another summer denizen of the alpine zone, would likely see its habitat shrink. These finches are strong fliers and do range widely. In response to increased temperatures they may simply move their range northward, with their numbers in Washington much reduced.

The American Pipit, another alpine breeding bird, barely has a range toehold in Washington. This species would likely shift northward as its mountain top habitat shrinks.

The three examples above all refer to birds that breed in Washington. Also potentially affected are birds that traditionally winter in Washington. Birds such as the Northern Shrike, Snowy Owl, and Common Redpoll that now descend from the northern boreal forests and subarctic may find Washington too warm in winter to meet their life history needs, or may find themselves competing with species that once migrated out of the state for winter, but no longer migrate under milder winter conditions.

Temperature change will influence other variables that will then indirectly impact birds. For example, increased temperatures will mean a reduced snowpack, earlier melting, earlier runoff, and a greater rate of evaporation during summer. These changes will likely influence water availability for wetlands, lakes, reservoirs, and rivers (including the Columbia), thereby impacting wetland birds. Shallow lakes and seasonal wetlands could be reduced in size or disappear altogether, taking valuable bird habitat with them.

Timing and amount of precipitation are strong determining factors for the type of habitat that characterizes a landscape. Precipitation is expected to influence birds' migration behavior, affecting the decision to depart based on food availability. Drought at critical migratory stopover sites will affect birds' ability to refuel and rest before completing migration journeys.[ix]

Precipitation trends in the Pacific Northwest are more variable than trends in temperature, but most monitoring stations show increases over the past 80 years. The largest relative increases were observed in northeast Washington and south central British Columbia, especially in spring. Along with an increase in precipitation, scientists have recorded a decline in snowpack, particularly at lower elevations, since 1950. It is the lower elevations that are more sensitive to temperature change and warming trends. Declines have been largest in the central and southern Cascade Mountains.[x]

Nearly all of the climate models project wetter winters and drier summers in the 2020s and the 2040s in the Pacific Northwest.[xi] As mentioned, the timing and distribution of water in conjunction with increased temperature is expected to have widespread impacts on Washington habitats, and therefore birds. Waterbirds in Eastern Washington would be faced with less breeding habitat. Shallow lakes that produce ducks and support migrating waterfowl each year could dry before birds fledge, and long before fall migrants arrive.

Washington IBA species potentially impacted by changes in temperature and precipitation driven by climate change.

Low Risk	Moderate Risk	High Risk
Black-crowned Night-Heron	American Bittern	Western Grebe
Cinnamon Teal	Canvasback	Clark's Grebe
Common Goldeneye	Ring-necked Duck	Black-necked Stilt
Hooded Merganser	Lesser Scaup	American Avocet
Osprey	Ruddy Duck	Long-billed Curlew
Lewis's Woodpecker	Virginia Rail	Black Tern
	Sora	
	Sandhill Crane	
	Long-billed Dowitcher	
	Wilson's Snipe	
	Wilson's Phalarope	
	Forster's Tern	
	Willow Flycatcher	

Migration and Phenology

Migration is ultimately about access to food resources, rather than escaping cold winters as humans are prone to do. But changes in both temperature and precipitation are expected to affect bird migration by affecting the decision to depart wintering or breeding areas based on food availability.



Figure 14. Washington's migration connections based on the winter destinations of 44 species of breeding birds. The "Links" are created by the species that we share in common, the places where Washington's summer breeding birds spend their winter.

About 70 percent of Washington's birds migrate, meaning a huge percentage of our birds are vulnerable to climate change as it affects migration. Mitigating this circumstance is the fact that many of our breeding birds are medium-distance migrants, wintering from California through Central America. Long distance migrants that travel as far as the high arctic to South America will continue to face greater obstacles to survival. Climate change is expected to produce more severe storms (e.g., hurricanes), which further threaten birds along their migration routes.

Migratory species are particularly vulnerable to disruptions in predator – prey interactions. This is due to the fact that migration cues—the environmental signal that tells an individual it is time to start migrating—can become completely disconnected from the timing of prey availability along the migration route and at the summer breeding site. This is known as *phenological disjunction*. Migration is an exquisitely balanced phenomenon, relying on the availability of resources for refueling along the travel route. Many species also appear to time their migrations to arrive on their breeding ground just as food resources become available. For those who arrive at just the right moment, the best territories are uncontested and food is available for survival. In a world of disrupted predator – prey interactions, food may not exist to refuel migration journeys, and insects may not have hatched when an individual arrives on its breeding ground. Drought at critical migratory stopover sites will affect birds' ability to refuel and rest before completing migration journeys.[xii]

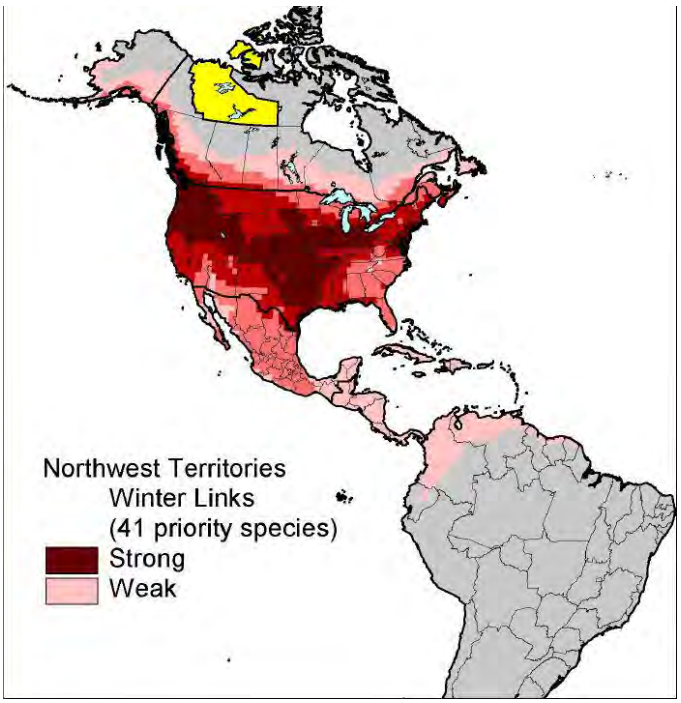


Figure 13. Washington has strong migratory bird links--and therefore stewardship responsibility--for birds that breed in the Northwest Territories (shown) and the Yukon, and winter in Washington.



Figure 15. Will the millions of migrating birds that rely on Washington to provide food and resting sites twice each year still find our state welcoming? Our collective actions to reduce the risks of climate change will determine the answer to that vital question. © Jeff Larson.

Range Changes

Research into Washington's birds changing their ranges in response to climate change is in its earliest stages. However, enough research and examples of this phenomenon from other parts of the US and the world exist to suggest that Washington's birds will respond, and probably are already doing so.

The combination of variables influenced by climate change is expected to result in a range contraction for many bird species, reflecting less suitable habitat for these birds. In fact, range contractions are expected to be more common than range expansions.[xiii] Species of birds with ranges that both contract and shift are likely to be most threatened by climate change.

In a publication entitled *The Bird Watcher's Guide to Global Warming*, the National Wildlife Federation and the American Bird Conservancy predict that the Pacific Northwest will lose 32 percent of the bird species currently in our area.[xiv] Some new species are predicted to move into the rearranged climate and habitats of the region, resulting in a net loss of 16 percent of the total number of species now occurring here.

Some species of birds are shifting their ranges, showing up earlier in spring, and initiating nesting earlier in the year, a behavior pattern consistent with climate change effects.[xv] A recent study examined 56 species of birds in eastern and central North America, examining changes in their distribution over a 26 year period.[xvi] Researchers at Audubon are working to expand this type of study across the US, but for now it is interesting to look at the range shifts of the species from the study that also occur in Washington.

In a similar study examining changes in the distribution of 254 species across the US and southern Canada, researchers found "broad-scale geographic and taxonomic evidence that poleward shifts in geographic ranges occurred for avian species wintering in North America" between 1975 and 2004.[xvii] This trend appeared to be due to colonization events on the northern boundary of species' ranges, driven by a combination of climate change and regional human activities (though this latter factor explained a relatively small proportion of the poleward movement).

Washington birds showing a pronounced northward movement in their ranges (National Audubon Society's 2009 State of the Birds Report).			
Species	**Distance (miles) moved to north continentally over 40 yrs.**	**Center of Abundance Relative to WA**	**40-yr State Cumulative Population Change**
Marbled Murrelet	361.9	North	-95.9%
Rock Sandpiper	93.9	North	-84.3%
Gadwall	148.9	South	2927.7%
Surfbird	61.1	South	344.5%
Spotted Towhee	215	South	226.2%
Tundra Swan	129.1	South	398.9%
American Crow	88.8	South	1638.5%
Red-winged Blackbird	99.3	South	631.3%
Rock Wren	10.6	South	631.3%
Hermit Thrush	91.4	South	1141.6%
Mourning Dove	147.3	South	1993.4%
Golden-crowned Sparrow	155	South	1397.4%
Say's Phoebe	29.9	South	1704.4%
Wood Duck	37.1	South	9543.3%
Western Scrub-Jay	45.8	South	67673.3%

Ecosystem Disconnect

Climate change is forcing a shift in phenology—the timing of key life history events. Predator, prey, parasites, and host plants are not necessarily responding at the same rate, leading to ecological disconnects and ultimately, ecosystem reordering. Nesting and migration are two elements of bird life history that are well studied, with a growing number of studies already suggesting a strong response to climate change in birds. These changes can force a species' life cycle out of synchrony with the ecosystem of which it is a part. The Common Murre, a species that has declined 93 percent in Washington since the 1970s[xviii], has advanced its breeding date 24 days *per decade*, apparently in response to climate change[xix]. A study evaluating more than 50 years of data found that four species occupying diverse niches are laying eggs earlier in conjunction with warming local climates[xx]. A study of 3,450 Tree Swallow nest records found that this species advanced its egg-laying date by nine days between 1959 and 1991[xxi].

An excellent example of a disconnection between an animal and the environment to which it is adapted involves the Gray Jay. In Washington, Gray Jays are found primarily in mature, humid, sub-alpine spruce forests. They do not generally breed below 2,000 feet, and are most often found above 3,000 feet to the tree line, and they also prefer undisturbed forests[xxii]. Gray Jays collect and cache food in order to stay at high elevations, and also to begin feeding their chicks. This caching behavior allows them to breed earlier than most other birds in their elevational range. But Gray Jays have declined by as much as 60 percent along the southern edge of their range. The reason appears to be food caches that are rotting because of warmer than normal temperatures, affecting the Gray Jays' ability to feed their young[xxiii].



Figure 16. Gray Jay, an iconic bird of high elevation conifer forests. Jeff Larson Photo.

Changes in Atmospheric and Ocean Circulation

One of Washington's outstanding features, of course, is the Pacific Coastline and the wealth of marine resources the state offers. In the context of climate change, the impacts of sea level rise are discussed elsewhere on this site. Climate change is affecting the oceans in other ways as well, and seabirds are indicating early responses to climate change.

Prey distributions are changing at some locations in the oceans. Plankton communities, at the base of the marine food chain, have made significant shifts of as much as 10° latitude in response to changes in sea surface temperature.[xxiv] The world-wide distribution and abundance of shorebirds has been shown to be related to the productivity of adjacent coastal waters.[xxv] These processes affect not only birds in the open ocean, but coastal species as well.



Figure 17. Pigeon Guillemots are one of many seabirds that would likely decline as food resources become more scarce with the increasing frequency of El Nino events. Photo (c) Jeff Larson.

Climate change also appears to be having an effect on the El Nino – La Nina cycle. Since 1976, cycles have been exceptionally long with an imbalance between phases, with five El Nino events to every two La Ninas.[xxvi] El Nino events tend to drive atmospheric temperatures higher, exacerbating the effects of climate change. In fact, a feedback cycle seems to be created whereby small rises caused by greenhouse gases are amplified, feeding back and amplifying the intensity of the El Nino cycle. El Nino events are associated with floods, droughts, and other disturbances in a range of locations around the world. The Pacific Northwest states tend to experience dry but foggy winters and warm, sunny, and early springs during an El Niño. Furthermore, El Niño is associated with increased wave-caused coastal erosion along the US Pacific Coast. Offshore, El Nino events bring warmer, nutrient-poor water to coastal Washington, compromising the base of the marine food chain.

The table below lists the IBA species of concern that may be impacted by changes in oceanic circulation and upwelling. Of immediate concern are Common Murre, which has declined 93 percent since the 1970s, and the Western Grebe, which has declined by 81 percent in the same time period.[xxvii] Whether these declines are linked to climate change is unknown at this time.

Washington IBA species potentially impacted by changes in atmospheric and ocean circulation.		
Low Risk	**Moderate Risk**	**High Risk**
Brandt's Cormorant	Red-throated Loon	Common Murre
Pelagic Cormorant	Sooty Shearwater	Pigeon Guillemot
Western Grebe	Pacific Loon	Cassin's Auklet
Black-legged Kittiwake	Black-footed Albatross	Rhinoceros Auklet
	Northern Fulmar	Tufted Puffin
	Pink-footed Shearwater	
	Buller's Shearwater	
	Sooty Shearwater	
	Fork-tailed Storm-Petrel	
	Ancient Murrelet	

What You Can Do

At best, greenhouse gasses already in the atmosphere will linger and impact our planet's climate for decades; swift action to reduce emissions is urgently needed. Adding to this sense of urgency is a recent study concluding that the effects of climate change may in fact be *irreversible*[xxviii], suggesting that any damage we do now will require long-term adaptation. To achieve the 60% reduction in greenhouse gas emissions that the scientific community believes is necessary will require not only individual action, but also the collective action of governments and societies around the world.

- Urge action from your legislators at both the state and federal levels. Though far from perfect, legislation supporting Cap and Trade programs to regulate carbon are a step forward.
- Support local planning actions that result in improved public transportation systems and pedestrian and bicycle friendly communities.
- Take personal action to reduce your own carbon footprint.
    - Understanding the size of your carbon footprint is a good place to start. Many on-line calculators such as the one provided by The Nature Conservancy or SafeClimate are available and will give you a quick snapshot of where you stand as a carbon contributor.
    - Make your home as energy efficient as you can. Many important changes are easy, quick, inexpensive, will result in reduced energy bills, and in some cases may even be subsidized by local utility companies. For a list of actions, see Audubon's web site.
    - Recycle everything. Most of the items that pass through our hands on a daily basis produced greenhouse gasses in their manufacture and delivery. The more we can reuse and extend the life of these items, the more we will improve the efficiency of our systems.
    - Cars are a significant source of greenhouse gasses. Make a commitment to use public transportation whenever possible. When you do need to drive, combine errands to make maximum use of your trip. When your current vehicle reaches the end of its useful life, replace it with a low-emissions vehicle that also gets good gas mileage, such as Toyota's Prius.
    - Become a locavore—eat foods that are produced near your home to reduce the quantity of carbon-based fuels needed to ship your food.
- Green your workplace, where 40% of greenhouse gas emissions in developed countries arise. Easy and helpful changes include turning off lights, copiers, and computers at the end of the work day. More difficult but no less important is getting the thermostat set to more reasonable levels, both summer and winter. Check out the World Wildlife Fund's Climate Savers initiative.

- Join Audubon's activist team and urge our elected official to make global warming a top priority by signing our petition at birdsandclimate.org. Voice your support for new approaches to help solve global warming, move us toward a 100 percent clean energy future, reduce our dependence on oil, and protect our environment. Stay informed, write letters to your leaders, and support candidates who promise to take the aggressive and farsighted actions necessary to curb global warming.
- Support conservation efforts that protect and restore essential bird habitat, keeping it healthy to better withstand global warming. Visit www.audubon.org to learn how the Important Bird Areas program is building a national network of conservation stewards. And join in Citizen Science efforts like the Christmas and Great Backyard Bird counts http://www.audubon.org/bird/citizen/index.html to help us monitor how climate change may be impacting birds and habitats.
- Manufacturing, packing, transporting, and selling goods not only use huge amounts of energy but also release excessive amounts of greenhouse gases. When shopping, always ask, "Do I really need this? Does the Earth really need this?" You'll probably save money as well.
- An average tree absorbs ten pounds of pollutants from the air each year, including four pounds of ground level ozone and three pounds of particulates. So, plant leafy trees around your house to provide windbreaks and summer shade. When shopping for lumber, ask about certified wood to support sustainably managed forests that are bird-friendly.
- Power plants are the single largest source of heat-trapping gases in the United States, but in some states you can switch to utilities that provide 50 to 100 percent renewable energy. You may also want to consider installing solar panels on your home.

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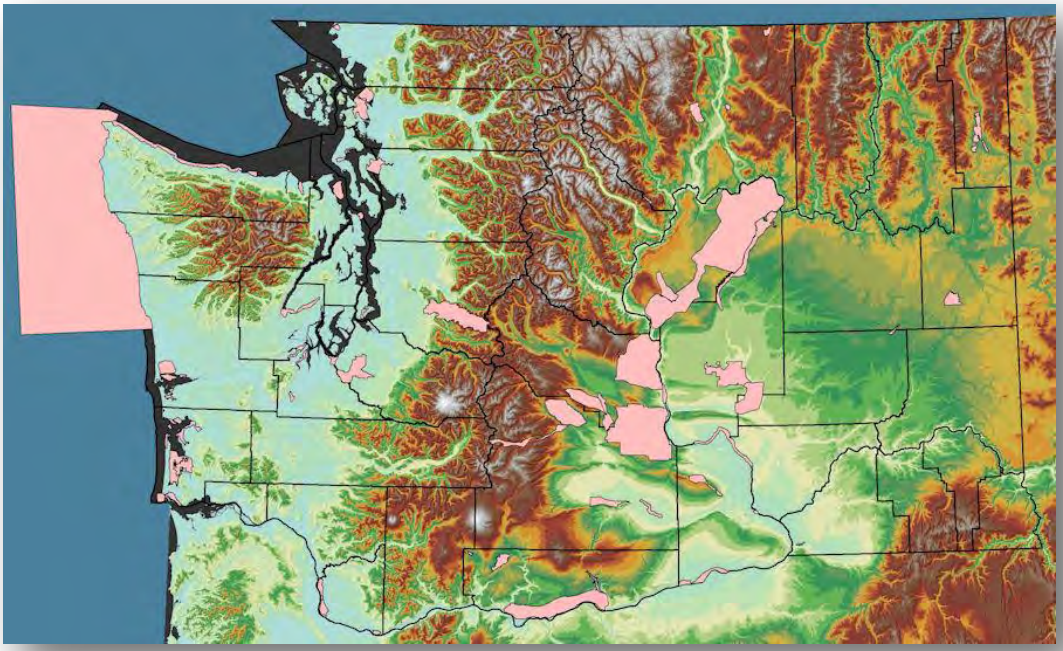
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Submission Number: ***MBTL-SEPA-DEIS-0000326***

Received: 5/11/2016 2:17:23 AM
Commenter: CLAIRE WARNER
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and wan to underscore my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing market, thereby spurring greater investments at home. Washington has long depended on trade and exports as vital part of our economy, directly and indirectly creating nearly 40 percent of all of our stat's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0000011***

Received: 4/29/2016 3:49:31 PM
Commenter: George Warner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

This is a great use of an old industrial site. We need more companies willing to clean up and utilize brownfield sites. Millennium has helped clean up the old Reynolds facility and the Columbia River. The old industrial site had degraded water quality and fish habitats on the river. Millennium has completely turned this around. Millennium has demonstrated a commitment to do everything in its power to contribute to the well-being of the community and local environment. If you ask people in Longview what they think of Millennium, they will tell you they are a good neighbor, good employer and responsible steward of our environment. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility. Sincerely, George E. Warner

Submission Number: ***MBTL-SEPA-DEIS-0001968***

Received: 6/6/2016 2:15:54 PM
Commenter: George Warner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The draft environmental study for Millennium Bulk Terminals coal export facility was sufficient. Please move forward. There are many benefits of the project that the community is waiting for. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. I appreciate you considering this feedback.

Submission Number: ***MBTL-SEPA-DEIS-0002708***

Received: 6/13/2016 1:28:52 PM
Commenter: Kacy Warner
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0002897***

Received: 6/13/2016 3:03:17 PM
Commenter: Kacy Warner
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002009***

Received: 6/6/2016 2:56:20 PM
Commenter: Larry Warner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to state my opinions on this important issue. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed Millennium Bulk Terminal would provide. The project would create work right away during construction, and plenty more jobs would stay around to run the terminal. Plus, all of those wages generated would trickle back into our local and state economies. At a time when our state unemployment rates are below the national average, we cannot miss big opportunities for new business like this one. We hear a lot of opinions about coal, but the reality of the Millennium Project is that it will have state-of-the-art equipment and best of all will bring life back to a site that has been left stagnant for some time. Many of us would love to have the opportunity to spend our entire career in one place. Millennium is offering that to us. Why not take advantage?

Submission Number: ***MBTL-SEPA-DEIS-0000850***

Received: 5/24/2016 12:52:15 PM
Commenter: Scott Warner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. Millennium is proposing to build a coal export terminal on an existing industrial site. This terminal will allow for a prime piece of working waterfront to actually be utilized and generate positive economic benefits in our community. It's about time! I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life. Sincerely, Scott G Warner scorows@aol.com 82716

Submission Number: ***MBTL-SEPA-DEIS-0002702***

Received: 6/13/2016 1:23:48 PM
Commenter: Adaline Warren
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0002695***

Received: 6/13/2016 1:14:40 PM
Commenter: Colt Warren
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0002697***

Received: 6/13/2016 1:18:55 PM
Commenter: James Warren
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0000456***

Received: 5/17/2016 7:25:00 PM
Commenter: Jeanne Warren
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. We should not let this project get caught up in politics. The company has demonstrated their commitment to meeting all of the environmental requirements. The draft EIS is sufficient and it’s time to move forward. Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays.

Submission Number: ***TRANS-SPOKANE-M1-00024***

Received: 5/26/2016 12:00:00 AM
Commenter: Richard Warren
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

SPEAKER 24: Hello. My name is Richard. I'm from Sandpoint. I have a master's in geology from Princeton.

Climate change is a huge stress to civilization and coal burning is a big contributor of CO2 and other pollutants such as mercury.

Additional coal trains daily through Sandpoint is not acceptable. The trains cross over Lake Ponderay and coal dust and chunks can be found along our tracks, the weight of these long trains stressing tracks making derailments inevitable. 19th century technology is not up to 21st century levels.

Our economy will also be damaged by noise, diesel exhaust, traffic delays, interruption of (inaudible). Communities along the rail line in Wyoming and Montana will all share the economic and environmental pain.

Washington's greenhouse gas emissions could rise by up to 30 percent, and this is contrary to policies recently passed in Washington State encouraging alternatives to fossil fuels. A plume of mercury from China, Korea, or Japan comes across the Pacific right to the Northwest. 1,400 tons annually were measured back in 2004, but the MBTL Draft EIS made light of mercury emissions.

Burning coal puts mercury in the air and into our food chain. Mercury can affect human fetal development and lead to lower IQ in children. Evidence associated with mercury is Parkinson's disease, Alzheimer's, and ALS.

We can avoid risking mercury pollution and climate change by not building the MBTL. Other countries are producing large percentages of their power from solar and wind, and we have the technology right now to do the same. We must retire fossil fuels, especially coal.

I urge you to deny the permits for the MBTL.

May 29, 2016

Subject:

Millennium Bulk Terminals-Longview

SEPA Draft Environmental Impact Statement

To the Washington Department of Ecology, and Cowlitz County:

The lack of transparency surrounding this project, and stretching back visibly at least five years, calls into question the validity of the released SEPA Environmental Impact Statement (EIS) with regards to providing a complete and accurate analysis of both the short and long term consequences of this project, realistically proportioned between the undeniable health risks posed to the general (and largely opposed: http://www.powerpastcoal.org/new-polling-strong-majority-of-washington-voters-oppose-coal-export-proposals/) public, the incontrovertible environmental degradation that will ensue, and the project's profits and economical yields as perceived by corporate beneficiaries of the project and their supporters.

When Ambre Energy proposed their plans to build the Longview export terminal in November 2010, it was a figure of 5.7 million tons moved annually that was publicly on the record. However, internal Millennium Bulk Terminals emails disclosed in February 2011 revealed that "the company hopes to export 80 million tons of coal through its proposed west of Longview terminal, nearly 15 times more than the company originally stated in its application for county permit." (http://tdn.com/news/local/millennium-internal-e-mail-reveals-goal-of-million-tons-in/article_8a86fa28-4072-11e0-b60d-001cc4c002e0.html)

Joe Cannon, Millennium CEO, responded to outcry over the deception with the statement: "When any business develops a site, they're going to look at all kinds of things. Different people speculate on different things, and they send e-mails, and that's where they came from." This is an abysmal justification for the clandestine deliberation over making the proposed project the West Coast's largest coal terminal. Awareness of misleading the public and state regulators is blatant in a November 2010 memo, in which "Millennium's former chief executive, Jeff Torkington, wrote that Millennium should deliberately wait at least two months before proposing an expansion, warning that Millennium could be 'perceived as having deceived the agencies.'" As Gayle Kiser, a resident of Cowlitz County said: "They knew darn well what they were about in keeping this quiet." (http://www.nytimes.com/2011/02/15/us/15coal.html) The secrecy is

understandable, as this foot-in-the-door approach is the only scenario with any likelihood of succeeding in the face of monumental resistance to the project.

I remind you of this past misconduct, so that it may be agreed that the initial proposal itself established a precedent of deceit and obfuscation of the realities of this project. That a basis of transparency would then be adopted in the years following is a naive assumption to be made, and it's an insult to all those affected by these proceedings if such a change-of-heart is suggested to have taken place. We cannot afford to place credence in Millennium with so much at stake.

Because this EIS is designed to address the current proposal, the extent to which it accurately predicts the impacts of the site depends upon the realism of projections put forth by Millennium as to the scope of their operation. However, Millennium's credibility has already been called into question, and therefore it must be asked whether the conclusions of this study truly represent the consequences of their expansion if greenlit, as prior evidence suggests that they may not intend to operate under proposed circumstances.

The inherent inability of EISs to be fully objective is laid out in the following publication (https://www.uow.edu.au/~sharonb/EIS.html), and brings up the additional concern of what attempts can be made at gauging potential bias in the formation of this document, or otherwise account for what may be (in the best case scenario) simply a benign lack of thoroughness, through evaluating the scope of the document and the diligence of its content in considering real-world impacts upon the health of the public, and towards critically upholding a global commitment to safeguarding the environment. I mention this concern because I feel the study falls short in these objectives, with one comment on an RSN article regarding the project (http://readersupportednews.org/news-section2/318-66/36631-proposed-coal-terminal-would-be-the-equivalent-of-adding-8-million-cars-to-the-road) pointing out the obvious about the released EIS: "Work through the Draft EIS even quickly and you will see why we are failing to address climate change. Broad but insufficient and deceptive incidental acknowledgements of impact in technical terms that few citizens will ever penetrate, while justifying with broad conclusions," is the skewed evaluative approach taken to addressing the 217,500 public comments taken in February 2012, and in responding to the vast opposition demonstrated both online and by the many persons attending relevant hearings in protest of the project. Jan Hasselman, attorney for the Power Past Coal Coalition, also points out that the draft EIS is "relying on unproven mitigation," the addressing of which is another area for improvement. (http://www.columbian.com/news/2016/apr/29/longview-coal-terminal-environmental-review-released/)

However, even with its shortcomings, the report gives officials all the evidence they need to deny permits for the project. "The report lays out a laundry list of significant impacts from the project," says Lauren Goldberg, an attorney with the environmental group Columbia

Riverkeeper. “There are number of places where the report identifies the massive amounts of carbon that this project will spew – equivalent to roughly seven new coal-fired power plants. These are stunning impacts for a state like Washington that’s shutting down coal-fired power plants.” (http://www.opb.org/news/article/environment-impact-longview-coal/)

“The widespread notion that the climate is something we can fix later—after more pressing priorities have been addressed—may be the biggest obstacle to actions and policies that would slow global warming, avoid some of its worst potential impacts, and allow more time for humans and other species to adapt to a changing climate. Even though scientists have repeatedly emphasized the urgency of the situation, their message isn’t getting through to the general public or to legislators who could make a difference.” (http://thebulletin.org/climate-change-irreversible-not-unstoppable8044) And we’re out of time.

Washington must not rescind its pledge to authenticity and humanistic values in a dying world. I support the “no action” alternative in the Millennium Bulk Terminals Draft Environmental Impact Statement (EIS).

Reject coal export.

Regards,

Katelyn Wasierski
Resident of Bellevue, WA

Wasserburger, Jeff (2545)

Submission Number: ***MBTL-SEPA-DEIS-0002545***

Received: 6/12/2016 8:08:49 AM
Commenter: Jeff Wasserburger
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Please support jobs by opening the millennial port. Thanks .

Submission Number: ***MBTL-SEPA-DEIS-0001695***

Received: 5/31/2016 6:53:38 PM
Commenter: Robert Wasson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Our state is trade dependent and a critical part of the import/export infrastructure of the West coast. International trade is essential to the economy of Washington and supports many family-wage jobs. I support Millennium Bulk Terminals site in Cowlitz County. These trains are no different than the coal cars we've transported through our state for many decades. In reality, not one ton more of coal will be used globally because of U.S. exports, and the net gain in greenhouse gas emissions is insignificant. If we don't build these terminals, energy suppliers will just look elsewhere for their supply! Please do not delay the permitting process any further. It is important to get people back to work. There are good jobs on the line and waiting on your review.

Submission Number: ***MBTL-SEPA-DEIS-0000184***

Received: 5/10/2016 3:18:52 PM
Commenter: Marc Waters
Organization:
State: New York

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please do not add anymore issues to the world we are trying to save. The only path to save our planet is investment only in non wnviroment impacting fuels and infrastructure. We cannot add anymore Carbon emissions to the Earth. Life as it is, is invisibly on the breaking point before we suffocate in a cup filled with smoke. We must reverse the damage done and build with clean energy.

Submission Number: ***MBTL-SEPA-DEIS-0001519***

Received: 5/31/2016 4:35:11 PM
Commenter: Tom Waters
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the opportunity to add my voice to that of others in supporting the environmental study for the proposed port at Longview. The DEIS will present a clear picture of how Millennium Bulk Terminals will proceed in opening and operating this port and the economic, environmental, and social benefits of this project are deserving of approval. Regulators have been looking at this project for years, and it’s time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments â€" it’s time to let it. The agencies are doing a great job of evaluating Millennium Bulk Terminals port proposal. I am convinced that this project’s permit should move forward without further delay.

Submission Number: ***MBTL-SEPA-DEIS-0003105***

Received: 6/13/2016 5:40:53 PM
Commenter: Cia Watson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000446***

Received: 5/17/2016 7:08:11 PM
Commenter: Roy Watson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to submit my comments regarding Millennium Bulk Terminals proposed port at Longview. I fully support this project. What most folks in Seattle tend to forget is that not everyone in Washington lives in Puget Sound. Not all of us work in the high-tech industry, and we still earn good livings as farmers, working at ports or in manufacturing. We make things, harvest and develop natural resources, feed our community and help facilitate trade in our great state. And we need more jobs like this, especially in Cowlitz County where our unemployment rate is 8 percent. Millennium Bulk Terminals can bring great jobs to our county, not to mention the much-needed tax revenues. Let’s not forget about how much time, effort and money Millennium has spent to clean up the port. Frankly, it was an environmental blight on our community, but now it will be a critical link for expanding trade for Southwest Washington. Again, having good jobs and protecting the environment can go hand in hand. Thank you for listening.

Submission Number: ***MBTL-SEPA-DEIS-0000872***

Received: 5/24/2016 4:40:38 PM
Commenter: William Watson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! The important thing is that the concerns people have of the proposed project that Millennium Bulk Terminals is offering will be addressed responsibly. Exporting at Millennium is needed now to bring a tremendous amount of good paying jobs and increase tax revenue to the local area. I ask that you keep the permitting process at an expeditious manner. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000632***

Received: 5/20/2016 1:14:17 PM
Commenter: Stephen Watzek
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The proposed coal export terminal at Longview should be approved. Millennium Bulk Terminals has a clear and environmentally-sound plan that will be studied to make this port a reality and it will do much to contribute to the economy and vitality of the region and the country. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. Thank you for reviewing my comments. This project is deserving of an impartial EIS and should not experience further delays.

Submission Number: ***MBTL-SEPA-DEIS-0000801***

Received: 5/23/2016 4:54:45 PM
Commenter: Jack Waugh
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Our state is trade dependent and a critical part of the import/export infrastructure of the West coast. International trade is essential to the economy of Washington and supports many family-wage jobs. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium's proposal is unprecedented and has far reaching economic implications. This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible. Sincerely, Jack Waugh waujack.57@gmail.com 67839

Submission Number: ***MBTL-SEPA-DEIS-0002018***

Received: 6/6/2016 3:03:12 PM
Commenter: Jack Waugh
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. Thank you for reviewing my comments today.

Submission Number: ***MBTL-SEPA-DEIS-0002285***

Received: 6/9/2016 4:52:09 PM
Commenter: Shelly Wayne
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. I appreciate the agencies' hard work on reviewing this project. Please don't let it get bogged down in an expanded scope of review. This old industrial site needs a new life.

Submission Number: ***TRANS-LV-M1-00050***

Received: 5/24/2016 12:00:00 AM
Commenter: Robert Weage
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm Roger Weage (phonetic). I'm a resident of Longview, but I lived much of my life in the state of Oregon. In fact I was a State Representative in Oregon back in the 1980s and served on the Environmental Energy Committee. My background includes getting a degree in engineering from Oregon State University back in the 1970s, which helped me much in working on the committee. One thing that I've heard a lot of comments back and forth today, sitting here since one o'clock listening, and I've noticed a great deal the emotionalism, people trying to sway positions simply based on hyping issues at hand and trying to take a point and expounding upon it to the point of being reasonable. One of the things I noticed when I was in the legislature was that same process, and something that's going on I'm sure for Millennium. And I just want to urge this committee to be careful as they move forward. This committee needs to be careful to avoid undue political pressure pushing an unsupported agenda where others may reflect because of their ignorance an emotional position. I've see that in several cases when I was in the legislature, and I personally took the process of stopping legislation that was deemed environmentally sound or appropriate and promoting an environmental position in another case. But I just want to emphasize and encourage all the committee to resist any personal bias or recon and make sound decisions and recommendations based on scientific supportable and verifiable information. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000130***

Received: 5/8/2016 2:11:40 PM
Commenter: Nora Weaver
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Nora Weaver. I live in Bellingham, Washington. I respectfully request that the Longview Millenium coal export terminal project be denied all permits. We know that the scientific community around the world agrees that climate change is real, it is largely anthropogenically caused, and that the release of co2 from coal fired power plants is a huge factor. In order to avoid the addition of more devastating and possibly heretofore unknown impacts to our planet from climate change we need to get the earth's atmosphere back to 350 ppm of Co2, which is where we were only a few years ago. We are now at 407ppm and climbing. The Millenium Terminal coal export project will substantially contribute to worsening climate change. If this project is permitted and built the resulting accumulation of Co2 and other greenhouse gas emissions from the burning of that coal that will be released into the earth's atmosphere. How can that be mitigated? Additionally, the impacts of environmental degradation from mining the coal, human health impacts from transporting the coal via rail, and devastating marine impacts from cargo vessel transportation cannot be ignored nor mitigated. Climate change and the resulting environmental chaos we increasingly see deeply saddens me. We have measurable threats to our food and water supplies, burning forests, animal extinction rates soaring, and oceans dying. My children will not know the verdant earth that I grew up with. This matter affects all of us. Earth is our only home. Generations to come will wonder why we did nothing to avert the climate crisis. We must stop gambling with our children's future on this planet. Thank you, Nora Weaver Bellingham, WA

Submission Number: ***MBTL-SEPA-DEIS-0001546***

Received: 5/31/2016 5:02:01 PM
Commenter: Scott Weaver
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please consider my comments on the DEIS of the proposed Cowlitz County coal export terminal. This is an excellent project and one that will bring broad-ranging economic benefits to Washington and to the national economic outlook for years to come. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0003198***

Received: 6/13/2016 6:28:32 PM
Commenter: Jared Webley
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I support the terminal for two main reasons. 1. This project will bring much needed jobs to our state. 2. The Millennium project will be good for all trade in our state, which desperately depends on the ability to get our goods to market. I've been following this issue, and am glad to have the chance to weigh in. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn't like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. Millennium Bulk Terminals in Longview is offering to create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it. Sincerely, Jared Webley jwebley3@hotmail.com 99004

Submission Number: ***MBTL-SEPA-DEIS-0000515***

Received: 5/19/2016 5:17:54 PM
Commenter: Melody Weeden
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My comments pertain to the draft EIS for the Longview coal export facility. I hope you will give them good consideration. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. Thanks for considering my comments.

Submission Number: ***MBTL-SEPA-DEIS-0001772***

Received: 6/2/2016 4:53:04 PM
Commenter: Dan Weeks
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the agencies offering this opportunity to comment on Millennium Bulk Terminals DEIS. The port at Longview will bring many good paying jobs to Washington and will encourage the development of our natural resources nationwide, helping to lift us out of our current nationwide economic depression

Submission Number: ***MBTL-SEPA-DEIS-0000950***

Received: 5/24/2016 5:26:39 PM
Commenter: Jane Wegener
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It's with great enthusiasm that I write today to express my support of the DEIS, the study was thorough and it's time to get Millennium Bulk Terminals port off the ground and under construction. We need the jobs this terminal will provide. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium's proposal is unprecedented and has far reaching economic implications. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001803***

Received: 6/2/2016 5:22:11 PM
Commenter: Allen Wegner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Americans urgently need jobs and Millennium Bulk Terminals is ready to provide them. Please approve a reasonable response for the environmental study and help get Americans back to work. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. Thank you for accepting comments for this important project. Please make the necessary steps to move forward on its approval as soon as possible.

Submission Number: ***MBTL-SEPA-DEIS-0000038***

Received: 5/2/2016 1:31:53 PM
Commenter: Chris Wegner
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

For a few "family wage jobs" are we willing to sacrifice the health and safety of people and ecology along the rails, and the future of the entire planet due to the destructive forces of carbon in the atmosphere? Hell No! Stop the insanity! Stop this coal train!

Submission Number: ***MBTL-SEPA-DEIS-0002004***

Received: 6/6/2016 2:52:16 PM
Commenter: Rodger Wehage
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0002943***

Received: 6/13/2016 3:23:42 PM
Commenter: Mike Wehrle
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002060***

Received: 6/7/2016 4:25:44 PM
Commenter: Myra Weiler
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The Millennium Bulk Terminals proposed coal export terminal should be approved and the port should be allowed to move forward. It's good for Washington and her neighbors. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough now it is time to move forward with a fair process for permitting. This DEIS is being finely crafted. The progress this port represents should not be hampered. It's time to get folks back to work!

Elyette M. Weinstein
5000 Orvas Ct. SE
Olympia, WA 98501

May 24, 2016

Co-lead Agencies: Cowlitz County and
Washington State Department of Ecology:

Re: Comment on the DEIS for the proposed Millenium Bulk Terminals coal export terminal in Longview

Dear Agency Decision Makers:

This letter advocates the "No Action" alternative, i.e., denial of the permit to build the Millennium Bulk Coal Terminal in Longview.

I am gravely concerned about the weak and unenforceable mitigation. The Draft EIS proposes a reporting process for coal dust complaints.. A phone call or email to complain about coal dust fouling a person's lungs, home, and river is not "mitigation." The agencies should revise the Draft EIS and remove inadequate, unsupported, and unenforceable mitigation. My conclusion is based on years of experience working in the health field on behalf of the poor .

As you know, poor people and those of color will be most affected by airborne particulate matter emanating from coal cars traveling to the proposed terminal.

Applications to reduce coal dust emissions have not proven to be totally effective.

I have worked in Washington State (State) in the health care field for fifteen years. Based upon my years of experience working with poor people around the State I know that they will be least likely to be able to take advantage of the proposed mitigation systems. I worked with such mitigation systems.

The poor usually work multiple jobs and don't have the time or equipment to readily access data about mitigation that is readily accessible to people of means. Thus, the proposal undermines economic justice and racial equality. Mitigation methods are written from the perspective of the wealthy and entitled who are clueless about accessibility challenges of those who do not share their advantages.

In addition, this proposal will deal a gut punch to the State's finances at a time when we can't even fund basic education. The State will bear the health care costs of those most affected. The taxpayers will pay the cost. We will fund corporate welfare for a private company which produces a product that pollutes the planet.

How can this plan further the public interest?

The agencies must deny these permits in the name of economic and racial justice, as well as a sound fiscal policy that benefits the public that it was designed to serve.

Sincerely,

Elyette M. Weinstein
Elyette_w@yahoo.com

Weis, Martin (2110)

Submission Number: ***MBTL-SEPA-DEIS-0002110***

Received: 6/7/2016 5:08:07 PM
Commenter: Martin Weis
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to submit a comment regarding the draft EIS for Millennium Bulk Terminals coal export facility. I strongly support the project and the thousands of jobs this project will create. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium's proposal is unprecedented and has far reaching economic implications. I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001834***

Received: 6/2/2016 5:47:22 PM
Commenter: Fred Welch
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to state my opinions on this important issue. Raising a family is tough, and this economy is not making it any easier. That's why we need to capitalize on any opportunity that we have to provide good-paying jobs that can support a family. The Millennium Bulk Terminal project will create jobs that can help families give their children the head-start that they need. There are men and women throughout the state that are waiting for the chance to work hard for their families. It simply makes no sense to turn them away at this point. The co-lead agencies are presenting an excellent DEIS process. I urge them to proceed promptly with a final Environmental Impact Statement that allows Millennium Bulk Terminals to become one step closer to building, hiring, and exporting. Under this scenario good paying jobs will come to a community in need. Not only will the local but the regional economy will reap the benefits. Please do the right thing and make this project a reality.

Submission Number: ***MBTL-SEPA-DEIS-0001779***

Received: 6/2/2016 4:59:40 PM
Commenter: Shalma Wellington
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing about the Millennium coal export project. I believe this project is good for the community. This draft EIS is exhaustive; there is nothing further to study. Coal is an abundant commodity that moves freely in a global market. Asian economies consumed over 5 billion tons of coal in 2012 without any exports through Washington ports. Additional supplies to feed that market are coming on line from Australia, Indonesia, South America and Mongolia, and domestic supplies in China are becoming more readily available. Assuming that incrementally new GHG releases will result from some portion, or all, of future coal exports from a new terminal in Longview Washington that, at maximum capacity, would amount to less than 1% of Asian coal use, requires a degree of speculation that is not permissible under SEPA or NEPA. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0003420***

Received: 6/14/2016 2:43:54 AM
Commenter: Deborah Welsh
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I am vehemently opposed to allowing the transport of and building a terminal to transport coal from Longview, WA.

Submission Number: ***MBTL-SEPA-DEIS-0003333***

Received: 6/13/2016 9:01:04 PM
Commenter: Susan Welsh
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

This is an extremely bad plan. Bad for the environment, bad for the people along every route that will see increased truck and train traffic, bad for sea life that will be affected by increased shipping. Washington's economy is in danger from accidents as are the land and sea environments that are also at risk. Washington loses with this. The winners are corporations and the far east countries to which all of this flammable and dirty material is being shipped. Washington and Cowlitz County cannot win anything with this and we can all lose big.

Submission Number: ***MBTL-SEPA-DEIS-0000282***

Received: 5/10/2016 6:50:02 PM
Commenter: Kathy Welt
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I support American jobs and the proposed port at Longview will create much needed employment for hundreds of Americans. Please include my comments as part of the public response to Millennium Bulk Terminals plan. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn't like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. Thank you for reviewing my comments today.

Submission Number: ***MBTL-SEPA-DEIS-0002652***

Received: 6/13/2016 12:19:29 PM
Commenter: Byron Welter
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Welter, Lisa (0880)

Submission Number: ***MBTL-SEPA-DEIS-0000880***

Received: 5/24/2016 4:45:19 PM
Commenter: Lisa Welter
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold's site. They are an important part of our community and economy and will do even more great work once their permits are granted. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0000903***

Received: 5/24/2016 5:05:05 PM
Commenter: Lisa Welter
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview's quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. There might not be many who know how much coal is used in everyday occurrences, but for those who do, know Millennium's project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both. Thanks for reading my comments. Sincerely, Lisa Welter lisa.welter@cldpk.com 82801

Submission Number: ***MBTL-SEPA-DEIS-0001657***

Received: 5/31/2016 6:22:17 PM
Commenter: Kayla Wendland
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I recommend you quickly permit the Longview port, and that it be approved as soon as possible. The environmental study will clearly outline a plan that works for the benefit of jobs and conservation in Washington and that will deliver a commodity that is in demand by the worldwide electricity market.

Submission Number: ***TRANS-LV-M2-00066***

Received: 5/24/2016 12:00:00 AM
Commenter: Wendy
Organization: Mazamas Mountaineers
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for hearing our concerns. My name is Wendy. I am a scientist, medical herbalist, and writer for the Mazamas Mountaineers, in Portland. I grew up in Washington. I had the privilege of, in 2003, working on a glacial research project for the climate change interest in Alaska -- Geophysical Institute of Alaska.

We had a very accurate dataset going back to 1918, which we were able to see clear warm winter temperatures based on river ice and glacial data. We also analyzed glacial retreat rates and atmospheric deposits on the glacier.

My concern is coal burned in Asia will impact us globally. It is possible that it could come over here and affect us via air and ocean currents. Climate change is real. None of us are isolated from it.

Let me be the first to admit I am a hypocrite. I have ancestors in the petroleum industry. My great grandfather designed the Texaco star logo as a company draftsman.

I believe it is up to us, my generation, to provide a better future for our great grandchildren and to see the world -- to make the world that we want to see and to big companies that do care about our future and our health.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003039***

Received: 6/13/2016 4:53:59 PM
Commenter: Anita Werner
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Millennium Bulk Terminals proposed coal export terminal should be approved and the port should be allowed to move forward. It's good for Washington and her neighbors. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and shouldn’t have been treated so. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. This is an old industrial property being redeveloped. Keep the review to what is normal and factual. Sincerely, Anita Werner AWERNER@WESCO.COM 82718

Submission Number: ***MBTL-SEPA-DEIS-0003051***

Received: 6/13/2016 5:05:47 PM
Commenter: Ron Wertz
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001643***

Received: 5/31/2016 6:11:55 PM
Commenter: Kerry West
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The proposed coal export terminal at Longview should be approved. Millennium Bulk Terminals has a clear and environmentally-sound plan that will be studied to make this port a reality and it will do much to contribute to the economy and vitality of the region and the country. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn't like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. It is important that the public have the ability to comment on projects of this nature as the affects will last for years to come. Thank you for the opportunity to comment and please see that this project is worthy and should be allowed progress forward and develop.

Submission Number: ***TRANS-SPOKANE-Q1-00008***

Received: 5/26/2016 12:00:00 AM
Commenter: Nancy Westbrook
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am Nancy Westbrook and I am here in opposition of the coal trains coming through our area, mostly because of the environmental impact on our world, our nation. I think we already know what the health risks are and I feel that we're just wink, wink, nod, nod, pretending it's not there. So I would like to see them -- I am not happy with the amount of trains that are coming through our area.

The other reason that I'm against the coal trains is I live three blocks from the railroad tracks, so I am concerned about the safety of my neighborhood, my children, and my neighbor's children.

Submission Number: ***MBTL-SEPA-DEIS-0003012***

Received: 6/13/2016 4:35:13 PM
Commenter: Billiejo Westby
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0002780***

Received: 6/13/2016 2:19:43 PM
Commenter: Billyjo Westby
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0003323***

Received: 6/13/2016 8:38:42 PM
Commenter: Jordan Westerholm
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am against the construction of a coal export terminal in Longview for the following reasons. -Construction and operation of the export facility would be a hazard because of the negative effects it would have on water quality, aquatic habitat, and air quality on site, especially if there was a train or ship accident. Additionally, the site is prone to liquefaction in the event of a major earthquake, which would make all possible hazards more likely due to unsettlement of structures and rails. -The open-air storage piles of coal at the facility would cause daily dispersion of toxic coal dust to the lungs of people and wildlife living in Cowlitz County (and likely anyone living in Oregon on the other side of the river). Air quality would be especially bad in the land immediately surrounding the terminal. Thusly the terminal's operation would have negative impacts on public and environmental health. -The 16 or so additional coal trains passing through communities en route to the terminal EACH DAY would cause respiratory health problems (from coal dust blowing out of the uncovered train cars) in these communities over time. It would also cause stratification of communities divided by rail lines, as well as congested traffic around these lines. The potential for derailments of these coal trains increases as the number of trains passing through cities and towns each day increases, and these tragedies would cost lives and money. -The transport of any fossil fuel overseas has it's own inherent problems, as demonstrated by the innumerable oil tanker spills that have occurred since such a practice began. Transporting coal across the ocean will result in coal spills, because that's the nature of the industry; it's been proven time and again. -The end result of the construction of an export terminal in Washington State is the burning of obscene amounts of coal in countries across the ocean, further exacerbating climate change around the world. -Millenium Bulk Terminals says the objectives of the construction of the terminal are to diversify the trading economy, create jobs, and create a competitive opportunity for western coal in world markets. While these may sound beneficial to some people, they are merely a set of outcomes that could result from the operation of a new export terminal. What MBT is really interested in is making money. That's their bottom line, realistically, no matter what they say in the EIS. Public and environmental health and safety very likely mean nothing to them, compared to the money they'll rake in. I am an ordinary citizen in Seattle, WA. I work at local parks and outdoor venues to educate children about why nature is important. I've experienced the heat waves and above-average summer temperatures and below-average rainfall that now have become the norm in Washington and will continue to get worse. I am young and have not stopped wondering what my future will hold as I watch the climate across the world become more unstable, and the likelihood of war and conflict resulting from this instability increasing. The construction of a coal export terminal in Longview, even just the consideration of such a thing, is a direct violation of sound mental judgement, morality, and feasibility. As a global community, we cannot continue down the path of fossil fuels, and we need to turn away from that path one coal export terminal at a time.

Submission Number: ***TRANS-LV-M2-00050***

Received: 5/24/2016 12:00:00 AM
Commenter: Barb Westrick
Organization: Longview School Board
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

EVENT HOST: We have one more elected official to speak at the top of the hour. We have Barb Westrick, Longview School Board.

MS. WESTRICK: Hi, my name is Barb Westrick, and I live in Longview. I am a retired preschool teacher and I'm also the vice president for Longview School Board. I am here to speak for myself, though, and for our children in our community.

I am concerned about the impact this will have on the health of our children. We are teaching our kids right now -- we have many school gardens in our schools right now teaching them healthy living, healthy foods. And coal is not healthy. And I'm worried about the impact in, especially, the Highlands neighborhood, which will be most affected by it. We also have an elementary school there.

And besides the -- everything else there's the train whistles, the noise from the tracks. And that could have a huge impact. Even if they do it at night it could impact their sleep and it could impact their learning and that's a concern I think we should think of. And also our area used to be really bad here. And now it's been cleaned up and we don't want to go back to what it used to be years ago.

We were one of the worst in the country. And I want to tell my union friends -- I have many union friends. I have picketed with them. My heart is for the union. I've always worked for them. But on this issue you guys need to look at the bigger picture and how this will affect the future of our children and our community. Please think about that.

Thank you so much.

Submission Number: ***TRANS-LV-Q3-00027***

Received: 5/24/2016 12:00:00 AM
Commenter: Barb Westrick
Organization: Longview School Board, Vice President
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Barb Westrick, and I'm on the Longview School Board, vice president, and I'm here to speak for myself but because I care about our children and our community.

I'm worried about the health effects that it will have on the children, especially in the Highland area. We have an elementary school there, and it's close to the site. And I think the impact of the train whistles and the noise could be a problem with their learning, and some of them may be a problem with their sleeping, which will still be a problem with learning. And I'm worried about that.

And, also, we have school gardens in all of our schools now, and we're trying to teach our children healthy living and healthy foods. And coal is not healthy. And I think it sends the wrong message.

And I'm also worried about if there's accidents. There have been coal fires and that puts toxic stuff in the air. What impact will we have in addressing these issues with the schools when we don't even have emergency preparedness down for what to do in those kinds of cases. And I don't want the kids to not be able to go out to recess because the air is bad. This really is a concern to me.

And I also do know that there is ocean acidification that the previous governor did a big study on it, and it was proven to be true. We cannot deny the implications of climate change and how this will affect the whole global world.

And, besides, the bottom line is the market for coal is going out. By the time this gets built, we probably won't -- it will probably be gone in a little while anyway and then we'll be back to where we were only we'll have this coal plant to deal with.

And I'm really concerned about the effects of the pile of coal by the Columbia River. I do not believe that even if they spray it, when we get 40 or 50-mile-an-hour winds that that will not go into the Columbia River.

And we have spent millions of money on salmon, helping our salmon. And we're going to just be wasting all of that because of the effects the coal will have on the fishing industry? So that's another big concern. And I could just go on and on, I have so many concerns about it. But I just want to voice my opinion and say we need to look at the big picture and not just 50 jobs. At the end of this, 50 extra jobs is not going to turn this whole community around for 50 jobs for what it's going to cost us in the long run. So thank you very much.

Submission Number: ***TRANS-SPOKANE-M2-00040***

Received: 5/26/2016 12:00:00 AM
Commenter: James Whalen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Hello, I'd like to yield my time to Dr. James Whalen.

(Appearing via Skype): Hello. My name is James Whalen, I'm speaking to you from New Castle, Australia.

I live in the world's largest coal export city. We export three-quarters of a million -- sorry, 150 million tons of coal each year.

As long as coal is being exported through New Castle, we have been concerned about the health effects, especially the air pollution impact. Over 3,000 Australians (inaudible) from the health effects of the air pollution each year. And (inaudible) to fine particle pollution will (inaudible) as proposed, most likely the coal dust.

And so as part of the pollution (inaudible) from Montana coal trains. And I did the math very quickly on the eight trains each day that will come through your city, and that's three-quarters of a million tons going in and out of your city each day -- I'm sorry, each year.

And BNSF, the railroad company in the U.S., it's making between one and three percent of the coal that's being transported is loss in transit, I'm (inaudible) between 100 and 100 tons of fine particulate pollutants here that can be deeply (inaudible).

And we in New Castle strongly urge you to think carefully about the health impact that might come (inaudible) and at the very least (inaudible).

Submission Number: ***MBTL-SEPA-DEIS-0000823***

Received: 5/24/2016 11:33:36 AM
Commenter: M Wheeler
Organization:
State: Oklahoma

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Please support the “no action” alternative in the Millennium Bulk Terminals Draft Environmental Impact Statement (EIS).

Whipple, Darrel (2440)

Submission Number: ***MBTL-SEPA-DEIS-0002440***

Received: 6/10/2016 2:27:55 AM
Commenter: Darrel Whipple
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The DEIS seems to dismiss as negligible the surface runoff from the proposed plant. This conclusion should be re-assessed in light of the recent research from NOAA and Washington State University's Research and Extension Lab at Puyallup showing that adult Coho salmon die within hours of exposure to urban stormwater runoff.

Submission Number: ***MBTL-SEPA-DEIS-0002518***

Received: 6/11/2016 1:49:49 AM
Commenter: Darrel Whipple
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

A consensus is building among climate scientists and policy makers that limiting global warming to 1.5 degrees C. rather than 2 degrees is necessary to prevent rising sea levels from driving millions of refugees off vulnerable sea coasts and islands. The EIS should acknowledge the significance of the 1.5 degree goal and address whether Millennium's emissions and/or mitigations must be adjusted to help the state contribute to reaching that goal.

Submission Number: ***MBTL-SEPA-DEIS-0002519***

Received: 6/11/2016 2:18:41 AM
Commenter: Darrel Whipple
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Several revisions are needed for the EIS: 1) Need to revise assumptions about GHG emissions from natural gas operations in light of recent discoveries of widespread leakage during normal handling, as well as at out-of-control wells like Aliso Canyon in California. 2) Need to acknowledge the continuation of GHG emissions from the proposed plant beyond 2038 through the life of the plant. 3) Need to revise all cumulative evaluations/comparisons and coal market dynamics for the EIS now that Gateway Pacific has been halted.

Submission Number: ***TRANS-LV-Q3-00019***

Received: 5/24/2016 12:00:00 AM
Commenter: Darrel Whipple
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm Darrel Whipple. 76439 Alston Mayger Road, Rainier, Oregon 97048.

My wife and I have lived at Alston, between Rainier and Clatskanie, since 1970, and raised our boys on our ten-acre farm there. I'm a retired elementary teacher, and I now manage the family tree farm near Clatskanie. I am an active leader of Envision Columbia County.

Like all of us, I want the best future for my kids and grandkids. So, we keep going through these wrenching dramas forced upon us by the wealthy fossil fuel industry dangling badly-needed jobs and public revenue in our faces, tempting us to sell out our future and forsake our grandchildren's future on a livable planet.

Thankfully, we have the DEIS, which addresses the many concerns about the Millennium project with a fact-based approach. Well worth careful reading.

I did note with disappointment that the DEIS does not hold Millennium accountable for mitigating or offsetting the combustion of its 20 years of coal export, only the emissions from transport and daily operations.

The DEIS does tell us that the emissions from burning all that coal at Asian destinations amount to 90 million metric tons of Co2 up through 2038.

But somebody else is responsible for the burning, it's out of our hands we say, not our problem. We don't have to mitigate or offset all that permanent degradation of our global atmosphere, even though morally we are just as responsible as the Japanese, Taiwanese, Chinese, and South Koreans who will actually burn it.

Oh but if we don't ship them our low sulphured coal, won't there be dirtier coal elsewhere? That assumption is naive. The DEIS correctly figures that putting our coal on the Asian market will have the effect of lowering coal prices in the Asian region, inducing further demand for coal in general and incentivizing decades more dependent on coal for electricity generation instead of renewables.

Facilitating that debacle is not a smart move on our part. Ninety million metric tons of Co2 equivalent in the first 20 years, and I'm guessing even more than 90 million in the following 20 years, there being no ramp-up period for those decades.

The DEIS cuts off the analysis at 20 years, but if we continue to breathe life into the dying coal industry through projects such as this, the harm to the climate will continue and worsen with each decade as tipping points are reached and feedback loops exacerbates the greenhouse effect.

Ninety million tons of Co2 equivalent is about as much as a year's worth of Co2 emissions from all sources in Washington, including transportation and coal combustion.

Seems bizarre that the DEIS suggests that Millennium should mitigate for only 2.8 percent of that amount, and that only at a rate of 50 percent.

But there is also the assumptio llennium's coal will substitute in the Asian market for coal sourced elsewhere, as if the other coal will not be burned, or will be burned later down the road. So we are wise to get in and compete.

I submit that this sort of thinking is haywire. It will result in every source developing its supplies to the utmost, thereby perpetuating a low-priced coal economy to the detriment of the climate and people's health. I think we have a moral obligation to not become part of the coal economy and to urge the phase-out of fossil fuels as we build a low carbon or no carbon economy with efficiency and renewable.

For that reason I recommend the no action alternative.

Submission Number: ***TRANS-LV-M2-00014***

Received: 5/24/2016 12:00:00 AM
Commenter: David Whipple
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am Darrel Whipple (phonetic), Rainier, Oregon 97048. I've been a father, grandfather, retired elementary teacher, manager of a family tree farm near Clatskanie, active leader in Columbia County.

Like all of us, I want the best future for my kids and grandkids. I'd like to speak for the no action alternative and against the Millennium project on the basis of the need to deal with the climate crisis.

The key takeaway I get from my informal study of climate change is that all of our efforts must be remove carbon dioxide from the atmosphere to reverse the current trend of increasing greenhouse gas emissions, not merely to temper the rate of increase.

And it makes no sense to me to encourage more extraction, shipping, and burning of coal, the worst carbon emitter of all. Leave it in the ground must be the mantra for energy planning henceforth because the remaining known fossil fuel reserves held by the energy companies today if burned are expected to raise the global temperature beyond somewhat acceptable increase of 1.5 degree Celsius, raising sea level a few feet and driving millions of people from their homes on vulnerable sea coasts and islands.

It amazes me to realize that we are the beneficiaries of 7,000 years of human civilization developing on relatively stable coastlines throughout that time with their accompanying food-rich estuaries supporting human population. Sea level rise caused by global warming is threatening that stability worldwide.

Our best way to sustain and protect our own estuary and those around the globe for our own secure future is to opt for a speedy phaseout of fossil fuels and build a low carbon economy with renewables. No action alternative, please.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0003284***

Received: 6/13/2016 7:43:12 PM
Commenter: Gavin Whitby
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001783***

Received: 6/2/2016 5:03:06 PM
Commenter: Carla White
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. Millennium already handles coal at their site, and they have done so for more than 70 years. This is not a broad departure from current industrial uses and should be treated as such. An environmental review of this time and scope should not have been needed to redevelop an old smelter site. The Draft EIS is sufficient, it’s time to move forward. I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Submission Number: ***TRANS-SPOKANE-M2-00060***

Received: 5/26/2016 12:00:00 AM
Commenter: Jerry White, Jr
Organization: Spokane Riverkeeper
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening, and thank you for the opportunity to speak tonight. My name is Jerry White, Jr. I'm a resident of Spokane, and I'm the Spokane Riverkeeper.

As the Riverkeeper, I am an advocate, a public advocate for a clean river. Our tag line is to protect and keep the Spokane River fishable and swimmable. It's important to understand that the Spokane River is the center of our community, and it is absolutely irreplaceable in terms of its value added to our community.

I would urge you to please choose the no action alternative. The Millennium Bulk Coal Export Terminal is a poor choice for our river and for our community.

I'm going to highlight, for multiple reasons, I'm going to highlight two. For one thing coal combustion does have and will have a direct impact on our river.

The Draft Environmental Impact Statement says that the Washington state greenhouse gas footprint would rise by nearly 30 percent if 44 million tons of coal were actually combusted. Climate science models have shown by actually science teams like Prestiges, U of W, climate science teams have had models that have shown that by 2080 we would lose 50 percent of our average snowpack. By the end of the century we may be converting to a rain-based system. So that would be a total loss of our snowpack.

Our snowpack is integral to maintaining a healthy, vibrant river in the low flow summer periods. And without it we would lose our river in the summertime periods.

This year we got a bit of a taste with our drought of what the future would have in store for us if we continue. Please choose the no action alternative. Than you.

Submission Number: ***MBTL-SEPA-DEIS-0002967***

Received: 6/13/2016 3:36:22 PM
Commenter: Joanne White
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. This is for the very future and survival of the United States Thank You

White, Scott (0564)

Submission Number: ***MBTL-SEPA-DEIS-0000564***

Received: 5/19/2016 6:08:48 PM
Commenter: Scott White
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Millennium Bulk Terminals has proposed a coal export terminal at Longview that is both environmentally-sound and economically beneficial. I ask that you approve this project and the environmental study without delay. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Submission Number: ***TRANS-LV-M1-00035***

Received: 5/24/2016 12:00:00 AM
Commenter: Will White
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. My name is Will White, and I have traveled here today from my home in Mosier in the Columbia Gorge National Scenic Area in support the no action alternative in Millennium Bulk Terminal Draft EIS. I'd like to focus today on the issue of coal dust slipping off the proposed uncovered railcars shipping 44 million tons of coal a year through Idaho, Washington, and Oregon. Many organisms would be affected by a total of 120 tons of coal dust each day falling on plants, animals, and sea creatures along the route and out to sea. With Longview tidal curves that could be as much as 56 miles. The coal dust effect on living matter is well documented. It smothers plant and animal life along its perilous way. It lessens the organisms' ability to photosynthesize by cutting off sunlight. It smothers and asphyxiates breathing in animals and humans and scrapes away protective layers from fish and animals. Some have proposed using surfactants applied to the coal to lessen the problem of coal dust but the surfactants would actually enable coal pollutants to more easily spread. Coal that was once safe inside the earth would now be let loose in the air on plants and in the soil and into our precious waterways, making lethal contact with our already endangered small supplies of once plentiful sea life, like oysters and salmon. We lose jobs and vital eco systems. Now, I know that many here today are rightly concerned about jobs, and I sympathize with that because jobs are important to our families and our economy. But I want to note that dozens of studies have shown that more jobs are created by developing renewable energy sources than by mining coal and shipping it to Asia. Thank you very much.

Submission Number: ***MBTL-SEPA-DEIS-0002035***

Received: 6/6/2016 3:18:27 PM
Commenter: Jacob Whiteside
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our state is trade dependent and a critical part of the import/export infrastructure of the West coast. International trade is essential to the economy of Washington and supports many family-wage jobs. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. It is important that regulatory agencies keep the playing field level by being fair and consistent. The permitting process for this coal export terminal should be similar to other export terminals.

Submission Number: ***MBTL-SEPA-DEIS-0001212***

Received: 5/26/2016 3:08:29 PM
Commenter: Kay Whiting
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Coal keeps our lights on!!!

Submission Number: ***TRANS-PASCO-M2-00028***

Received: 6/2/2016 12:00:00 AM
Commenter: Bob Whitlatch
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening. Thank you for the opportunity. My name is Bob Whitlatch (phonetic) of Franklin County.

My family owns and operates one of the largest sustainable vineyards in the state of Washington. We've won the Seattle Ag Award for the year, Association (inaudible) Business Green Ag for the year, Association of Washington Business Green manufacturer of the year. So I come, I think, with a pretty good sustainable and environmentally correct.

I believe China will continue to burn coal. I believe that the requirements in this order are quite assured that it's extracted and export it safely.

Therefore, I support the Longview Millennium project. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0000306***

Received: 5/10/2016 7:41:13 PM
Commenter: William Whitmore
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please move forward with the government’s environmental study. I say let's get moving with the Longview port ASAP. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. So let's get moving as quickly as possible to make this project happen. It's what's best for Washington, and best for our economy and tax base.

Submission Number: ***MBTL-SEPA-DEIS-0002982***

Received: 6/13/2016 3:54:27 PM
Commenter: Richard Whitten
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0002305***

Received: 6/9/2016 5:03:41 PM
Commenter: Trent Whittle
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed coal export terminal in Cowlitz County will strike the right balance between environmental stewardship and economic growth. It should be allowed to move forward. This project is exactly the kind of economic boost that the state really needs. The benefits are numerous. The terminal would create jobs, generate significant new tax revenue, and help attract businesses to our area. In many ways, it can be a source of continued growth for years to come. It is tough to believe that a project with an obvious upside like this has been held up for so long. Those in charge should view this project for its benefits to the community and see it through to the finish. Our citizens are counting on it. Thank you for your work to move forward with this project.

Coal Terminal EIS Hearing, Longview 05-24-16

Extensive study by scientists at Stanford & UC Berkeley emphatically shows that the nation can be totally energized by renewables. Three states including Washington* are singled out, as could be supplied 100% by wind, water, & sunlight by 2050. Yet we have before us the EIS for Millennium's proposed coal terminal. Overwhelmingly complex nature of the proposal is even more obvious when laid out on so many pages, so overwhelming that the combined abilities of Port & Millennium are no match. But, specific references to communities along the route of requisite coal trains -- one after another after another, miles of them, every day, for years & years to come -- references to our affected communities are few & vague in this EIS. Port & corporation still believe they may do what they want, without regard for affected people along hundreds of miles of track, without regard for anyone on this planet who breathes. I do not know how more clear we can be, we who oppose this project, that it is toxic for everybody, environmentally, medically, culturally, socially, economically. And my message to those who talk only of jobs: this project is not the only way to create jobs; sane uses of Port land would create jobs. I expect this proposal to be absolutely turned down, unless people have lost all ability to think. Millennium's proposal makes no sense. The region we live in is much bigger than Cowlitz County. We who live outside this county have something to say -- & do -- about this bonkers proposal. End this nonsense. Bury the proposal, in the ground, where coal & such projects should remain. Our state could be 100% sustainably energized by 2050. THAT is where we should be headed. Toward 2050. Not 1850 or 1950, but 2050. Forward, to 2050!

Den Mark Wichar
Science Teacher
Hough Neighborhood Association
Vancouver WA

*see attachment

Wichar, Den (3651)

A 100% wind, water, sunlight (WWS) all-sector energy plan for Washington State

Mark Z. Jacobson [a], [*], Mark A. Delucchi [b], Guillaume Bazouin [a], Michael J. Dvorak [c], Reza Arghandeh [d], Zack A.F. Bauer [a], Ariane Cotte [a], Gerrit M.T.H. de Moor [a], Elissa G. Goldner [a], Casey Heier [a], Randall T. Holmes [a], Shea A. Hughes [a], Lingzhi Jin [a], Moiz Kapadia [a], Carishma Menon [a], Seth A. Mullendore [a], Emily M. Paris [a], Graham A. Provost [a], Andrea R. Romano [a], Chandrika Srivastava [a], Taylor A. Vencill [a], Natasha S. Whitney [a], Tim W. Yeskoo [a]

a Atmosphere/Energy Program, Dept. of Civil and Env. Engineering, Stanford University, USA
b Institute of Transportation Studies, U.C. Berkeley, USA
c Sailor's Energy, USA
d California Institute for Energy and the Environment, U.C. Berkeley, USA

abstract

This study analyzes the potential and consequences of Washington State's use of wind, water, and sunlight (WWS) to produce electricity and electrolytic hydrogen for 100% of its all-purposes energy (electricity, transportation, heating/cooling, industry) by 2050, with 80e85% conversion by 2030. Electrification plus modest efficiency measures can reduce Washington State's 2050 end-use power demand by ~39.9%, with ~80% of the reduction due to electrification, and can stabilize energy prices since WWS fuel costs are zero. The remaining demand can be met, in one scenario, with ~35% onshore wind, ~13% offshore wind, ~10.73% utility-scale PV, ~2.9% residential PV, ~1.5% commercial/government PV, ~0.65% geothermal, ~0.5% wave, ~0.3% tidal, and ~35.42% hydropower. Converting will require only 0.08% of the state's land for new footprint and ~2% for spacing between new wind turbines (spacing that can be used for multiple purposes). It will further result in each person in the state saving ~$85/yr in direct energy costs and ~$950/yr in health costs [eliminating ~830 (190e1950)/yr statewide premature air pollution mortalities] while reducing global climate costs by ~$4200/person/yr (all in 2013 dollars). Converting will therefore improve health and climate while reducing costs.

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Wieck, Patrick (0541)

Submission Number: ***MBTL-SEPA-DEIS-0000541***

Received: 5/19/2016 5:44:57 PM
Commenter: Patrick Wieck
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. Media coverage would have us believe that transporting coal by rail through our state is unprecedented, it's not. We've transported coal through our state for many decades. The objections about coal dust are coming from squeaky wheel environmentalists speaking on personal conviction rather than scientific fact. An overwhelming majority of the state supports coal exports if they meet environmental requirements, and I do too. Local, state and federal regulators should consider that Washington can have BOTH economic growth and a healthy environment. I urge you not to be swayed by outside fanatics who do not care about our county or our people. The environmental review process for Millennium Bulk Terminals should be held to the same standard as every other port or infrastructure project. We have a very fair and comprehensive process in place, and I question the motives of those who say otherwise. Thank you for your consideration.

Karen Wieda

2608 Riverside Drive• West Richland, WA 99353
Phone: 509-366-1285 •• E-Mail: wiedagarden2@gmail.com

June 4, 2016

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

To Whom It May Concern:

Washington State has made a commitment to invest in in clean technology jobs for wind, wave, and solar energy, so it is astonishing to me that my state is considering approving the Millennium Bulk Terminals-Longview project. Coal export terminals would reverse major commitments to reduce the state's contribution to global warming pollution.

This is just one of the reasons I am opposed to the Millennium project. After reviewing the information that was provided at the public comment hearing on June 2 in Pasco and reading information that is available on the Internet on this project I am concerned about the following aspects of shipping coal through Washington State:

- The project would release coal dust during rail transportation and in handling and stockpiling coal at the terminal. The coal dust is not expected to pollute waterways or harm fish, but it would affect air quality and wildlife. It would increase particulate matter around the project site and impact anyone living in the area. Coal export terminals in other parts of the U.S. are notoriously dirty. Massive coal piles are regularly sprayed with water in an attempt to suppress the clouds of coal dust associated with outdoor coal storage. This leads to large quantities of filthy wastewater that, along with storm water runoff from acres of coal piles, will eventually discharge into the Columbia River.
- The project could significantly increase rail and vehicle traffic, adding wait times for vehicles at railroad crossings as eight mile-long trains a day deliver coal and leave the Longview facility. In addition there will be eight-mile long empty trains leaving the facility, 16 new trains a day. In small and large communities with train tracks the impact is staggering. A mile long train can block multiple crossings, tying up traffic in cities/towns they travel through daily.
- The train traffic from the coal terminal would exceed capacity on Cowlitz County rail lines and contribute to the excess capacity already expected on rail lines around Spokane, Pasco and Vancouver. Without rail line improvements, the impact of the train traffic will be "significant and unavoidable" and would increase the risk of accidents by 22 percent in Cowlitz County and Washington state. Accidents happen, ie the oil train derailment in Mosier, OR on June 2.
- The terminal would increase rail traffic noise along the shipping route – especially in places where trains are required to sound their horns. Those impacts would disproportionately affect low-income and minority populations. Here in the Tri-Cities that is especially true as the trains move through Pasco and Kennewick.
- The project would also affect ship traffic by adding 1,680 vessel trips – a 27 percent increase – on the Columbia River. It would increase the risk of an oil spill incident on the river. In Longview, Millennium proposes to store tens of millions of coal outdoors, year-round, and construct two new industrial ship berths on the Columbia. This will require dredging in shallow-water salmon and smelt critical habitat.

- An oil spill from a vessel could have significant impacts, and coal could affect waterways if it spills out of a train or a ship.
- The project would increase air pollution in the form of carbon monoxide and volatile organic compounds from ships and trains in Cowlitz County and across the state.
- Many high paying jobs will be created for construction of the new terminal but once completed the export of coal requires a small workforce and wastes hundreds of acres of waterfront property to store raw coal. The proposed 460-acre coal export site has tremendous potential for thousands of jobs in light industrial and smart-tech growth, instead of being mired in a single commodity dirty export trade.
- Finally we are shipping coal overseas, encouraging the continued burning of coal when we should be helping countries decrease their dependence on fossil fuels.

I **do not** support the Millennium Bulk Terminals-Longview project.

Sincerely,

Karen Wieda

Submission Number: ***MBTL-SEPA-DEIS-0003115***

Received: 6/13/2016 5:45:01 PM
Commenter: George Wienbarg
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! Please do not delay the permitting process any further. It is important to get people back to work. There are good jobs on the line and waiting on your review. Sincerely, George Wienbarg George@GeorgeJay.com 10036

Submission Number: ***MBTL-SEPA-DEIS-0002637***

Received: 6/13/2016 11:59:56 AM
Commenter: Kerry Wier
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002105***

Received: 6/7/2016 5:03:58 PM
Commenter: Tina Wigger
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough, now it is time to move forward with a fair process for permitting. Thank you for accepting comments for this important proposal. The Millennium project will do a great deal for the economic outlook of this country. Let's get Americans back to work!

Submission Number: ***TRANS-SPOKANE-Q1-00010***

Received: 5/26/2016 12:00:00 AM
Commenter: Carol Wilburn
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Carol Wilburn and I'm from Sandpoint, Idaho. I'm here as a career scientist, a professional engineer and an ethical human to testify that the only rational mitigation for the huge impact of this project is to keep the coal in the ground. Here's a sample of what we have to mitigate. The draft EIS does not and cannot address the sheer scope of it.

First, scientists know there is already too much carbon dioxide in the atmosphere. The additional coal of this project directly translates to more devastating forest fires and crop failures here, costly firefighting, loss of lives and livelihood, and increasing grocery costs.

Arguments have been made that Powder River coal shipped to Asia will keep other coal from being burned in Asia, but that coal is going to be burned somewhere on the planet. We can't dig up more coal and burn it.

Second, only keeping this coal in the ground will mitigate the damage to today's children and all the future unborn children who don't have a voice yet, their health, their wellbeing, their hopes to have a good life, to breathe clean air, to drink clean water, to eat nutritious, affordable food.

Already there's a landmark constitutional climate change lawsuit in the U.S. District Court in Oregon. In the suit, 21 young people from across the United States assert that in causing climate change, the Federal Government has violated the youngest generation's constitutional rights to life, liberty and property and has failed to protect essential public trust resources.

Does the draft EIS mitigate in this damage, not to mention the legal fees, settlement costs, and tax dollars of future litigation and liability? Bankrupt coal corporations can't pay such costs when they go out of business, and that's been the history.

Third, then there's the mitigation for rising sea levels along the world's coastlines, direct property loss, tax revenue loss, insurance costs, as well as the growing international claim that responsible countries and companies right or correct the damage in all the places in the world already suffering consequences of these kinds of projects.

Fourth, I don't see direct monetary annual payments to every family along the route of mining, transport, and export for their increased medical costs, their loss of sleep, the reduction of their property values, to mention a few.

Big money and big coal are currently buying influence that suits their vested interest to minimize and trivialize the effects. They haven't yet paid legitimate scientists to accurately tally these costs, but I don't dismiss these considerations and we can't. The only rational mitigation for these and other huge impacts of this project is to keep the coal in the ground.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002240***

Received: 6/8/2016 6:53:44 PM
Commenter: R. Wilcox
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to provide informed citizen feedback to this important issue. I oppose the approval of the EIS and construction of the terminal. I have worked for BPA and in energy policy. I understand at a detailed level the complexity and competing economic interests. I am fully supportive of economic development in Longview and along the Columbia, especially when it supports from the communities beyond cities in Washington, Oregon, Idaho and Montana. But I believe this project fails from a policy, EIS and economic standpoint. Coal would travel by a combination of rail and barge, adjacent to, or in, the Columbia River, site of our recent oil train problem. The Endangered Species Act governs Columbia River salmon and the terminal and coal transportation to and from it endangers those salmon. Even with dust controls and attempts to stabilize the coal dust as the coal is transported, the air and waters will be contaminated, including by accidents. The need for American coal in China is overestimated; China has an overabundance of coal deposits and has nearer imports from Australia, Indonesia, Pakistan, including metallurgical coal, from EIA and industry data. To be viable, the terminal would need iron-clad 20 or more year contracts for the purchase of the exported coal. The Columbia is a poor export terminal location due to the shallow draft of the river, even in the dredged channel. I express my appreciation for the opportunity to provide my feedback for and important issue you must decide. Best regards

Wilde, Cynthia (3786)

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☑ Noise
- ☑ Air Quality
- ☑ Human Health
- ☑ Rail Transportation
- ☑ Vessel Transportation
- ☑ Vehicle Transportation
- ☑ Coal Dust
- ☑ Greenhouse Gas
- ☑ Climate Change
- ☑ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☑ Water Quality
- ☑ EIS Regulatory Process
- ☑ Other topic
  water issues that shut down ports!

PLEASE SHARE YOUR COMMENTS BELOW:

Export energy producing materials!!! NO!!!

Coal? When we are trying to address climate change (for china?) ...

Routes through the columbia George scenic area at that capacity of traffic NO NO NO!

(additional space is provided on the back)

(comment continued)

Is this a Warren Buffet thing?

Ship it up to Prince Rupert where it does not impact soooo many people ——

Listen, I spent the month of December in India. Do we really want to trash the USA?

What in the hell are we thinking!

I am not for Trump but isolationism both export & import sounds good to me now, especially when our ag products (veg.) were dumped on our markets at will and ruined our fiscal year with NO profit.

Stop this craziness.

(Cynthia Wilde)

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

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- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- [ ] Noise
- [X] Air Quality
- [ ] Human Health
- [X] Rail Transportation
- [ ] Vessel Transportation
- [ ] Vehicle Transportation
- [X] Coal Dust
- [X] Greenhouse Gas
- [X] Climate Change
- [X] Plants and Animals
- [X] Marine Species, Fish, or Fisheries
- [X] Wetlands or Streams
- [X] Water Quality
- [X] EIS Regulatory Process
- [ ] Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

Energy production dependence on fossil fuels is Antiquated And more costly than wind And solar power production And nuclear power production. Energy conservation is essential to our planet's health And integrity. The ambient air concentration of carbon dioxide must be decreased to 350 parts per million for A viable planet Earth. Our international government must be established for the sole priority - A Viable Planet

(additional space is provided on the back)

(comment continued)

Christine E Wilhelm Clark
2002 W Hamilton Rd
Deer Park WA 99006

May 26-2006

Submission Number: ***MBTL-SEPA-DEIS-0001832***

Received: 6/2/2016 5:45:49 PM
Commenter: Cathy Wilhelms
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. This draft EIS is exhaustive and quite frankly, overreaching. For instance, because the proposal is a terminal proposal, the use of the bulk commodity by a third party is a superseding and intervening cause to the combustion of coal. As a result of these superseding causes, the construction and operation of the terminal is not a proximate cause of the combustion of coal. Enough already! I'm certain the draft EIS will clearly outline a project deserving support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.

Submission Number: ***TRANS-LV-Q1-00024***

Received: 5/24/2016 12:00:00 AM
Commenter: Larry Wilhelmson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm Larry Wilhelmson. I moved to Longview in 1961, and I remember looking west at Reynolds Metals and seeing all of the smoke coming out of there and, based on the testimony that I've seen today, we should all be dead by now because of the asthma effect. I'm supporting the coal export for three reasons. Reason number one is I believe we should give back to the rest of the world. We have a 200-year supply of coal yet we, as a country, have been importing 25 percent of the oil, and we're only five percent of the population. So, if we want to be compassionate, if we want the rest of the world to feel good about us, we ought to export the coal primarily for that reason and allow other people to get some of the benefits that we have. The second reason is that carbon dioxide is not a pollutant. Carbon dioxide is necessary for the growing of plants and along with temperature it's very necessary. There has been a lot of work done showing that we are not at the optimum carbon dioxide concentration now and we're not at the optimum temperature. Our carbon dioxide could be double what it is now, say 800 parts per million, and the temperature could be two degrees higher. What about temperature? Everybody is worried about the Earth getting too warm. We've had one and a half degree Farenheit increase in temperature over the last 100 years. During that period of time, we've had about 120 parts per million increase in carbon dioxide for one and a half degrees. If you don't know it, I'm telling you now it's an exponential function to get the next one and a half degree Farenheit. We have to add 240 parts per million of carbon dioxide. That's double the amount at the 2.4 parts per million that we get now per year, so we're looking at 100 years. Can you visualize what the world is going to be like in 100 years, and that one and a half degree would be -- so that's not even the two degrees that we should be for the optimum for producing food for the planet. So get off the carbon dioxide kick, it's not causing global warming, and it's great for you because you need it. Thank you for your considerations.

Submission Number: ***TRANS-LV-M2-00073***

Received: 5/24/2016 12:00:00 AM
Commenter: Cameron Wilkerson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening. I'm Cameron Wilkerson (phonetic), Castle Rock, Washington. I'm also a member of Local 26 plumbers and pipe fitters. It's unfortunate the only time people visit this community is when they come to dictate what we're going to do in our community.

This is an important project for this community. Like others said, it would be interesting to see the impact study on the impact of people traveling to work in other communities. I myself have worked outside this community for the past ten years, working.

This project will bring revenue to this community for our schools, for our public settings. Our port needs to grow economically. We need to see a growth in the industrial bays for work at our port.

It's unfortunate that we're blaming this facility -- right now I've heard people blaming this facility for problems with their children already. And I feel that's baiting and scaring our community members into thinking this is a bad project. I support this project and I'll leave it at that.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001844***

Received: 6/2/2016 5:57:18 PM
Commenter: Lynn Wilkins
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our state is trade dependent and a critical part of the import/export infrastructure of the West coast. International trade is essential to the economy of Washington and supports many family-wage jobs. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. Thanks again to the agencies for allowing public comment on this important proposal. It should continue to go forward with much enthusiasm.

Submission Number: ***MBTL-SEPA-DEIS-0001694***

Received: 5/31/2016 6:53:06 PM
Commenter: Peter Wilkinson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold's site. They are an important part of our community and economy and will do even more great work once their permits are granted. The opening of Millennium Bulk Terminals proposed coal export facility will have a significantly positive impact not only on the state of Washington but the entire country. So I not only urge you to keep this permitting process moving forward at an efficient pace, but to also to accept the DEIS as sufficient. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002341***

Received: 6/9/2016 5:30:55 PM
Commenter: Thomas Wilkinson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the opportunity to weigh in on this development project in Longview. Right off the bat, Millennium began working with the Department of Ecology to clean up the old Reynolds smelter site. In addition Millennium is working to restore the natural habitat along the Columbia River, it has removed and replaced old pilings, and has brought the existing dock up to minimum standards. Why has this project's permits for the export terminal taken so long? All this delay has done is postpone the cleanup and restoration of a great industrial port site. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0002900***

Received: 6/13/2016 3:04:18 PM
Commenter: David Willett
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
We need this project!

Submission Number: ***MBTL-SEPA-DEIS-0002911***

Received: 6/13/2016 3:07:55 PM
Commenter: Smith William
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you

Submission Number: ***MBTL-SEPA-DEIS-0000141***

Received: 5/9/2016 1:04:40 PM
Commenter: Cameron Williams
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Moving this project forward is important to me, my family and my community. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. It is clear to me, Millennium Bulk Terminals has a project that will have long-term positive impacts on local and regional economies in Washington. Millennium has maintained and presented ongoing efforts to uphold the current environmental regulations set for its project in Longview. I have good faith and trust this will continue and the company should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0002673***

Received: 6/13/2016 12:52:44 PM
Commenter: Carolyn Williams
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. I would like to say that as a child growing up in the 50's we had a coal furnace and a coal chute in our basement. I helped my dad shovel the coal into the furnace. We also hung our laundry in the basement as we had no dryer. There was no coal dust in our home or on our laundry. With the environmental standards we have today I do not believe we are in any danger from coal trains just like my family was not in danger from the coal used in our home in the 1950's. I believe in jobs for families, in good stewardship and in this project. Thank you. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002821***

Received: 6/13/2016 2:37:27 PM
Commenter: Craig Williams
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0003066***

Received: 6/13/2016 5:13:15 PM
Commenter: Craig Williams
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Cowlitz County Department of Building and Planning 207 Fourth Avenue North Kelso, WA 98626 Washington Department of Ecology Southwest Regional Office P.O. Box 47775 Olympia, WA 98504 Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Williams, Debbie (1010)

Submission Number: ***MBTL-SEPA-DEIS-0001010***

Received: 5/24/2016 6:04:12 PM
Commenter: Debbie Williams
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. Regulators have been looking at this project for years, and it’s time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments â€" it’s time to let it. The growing worldwide trade market needs an accessible, dependable, and conscientious facility to conduct business. I appreciate the planning Millennium Bulk Terminals has exhibited in its proposal for the project in Longview and wish to thank the agencies for its consideration in moving this project forward.

Submission Number: ***MBTL-SEPA-DEIS-0003113***

Received: 6/13/2016 5:44:15 PM
Commenter: Eric Williams
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Ours is an export state, and the Millennium Bulk Terminals will play a vital role in Washington's exports in the future. Coal exports are a huge opportunity for the Northwest. The infrastructure coal companies are creating will expand trade of all kinds, from apples to software. At a time of increased competition from both West and East Coast ports, Washington needs to seize these opportunities to expand trade and create thousands of family-wage jobs. The DEIS is relatively well done, but goes to unprecedented, untenable lengths in suggesting mitigation measures far beyond those intended in NEPA and SEPA. Setting the precedent put forth in the DEIS will lead to the logical next steps, such as requiring a wind farm in Washington to mitigate for the copper mined in Chile needed to make the turbines. Please ratchet back this document so it complies with common sense. Millennium Bulk Terminals in Longview is offering to create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it. Sincerely, Eric Williams hobsonemw@yahoo.com 99004

Hearing on DEIS Millennium Bulk Terminals, Longview, Washington

[5.24.2016; Inga Fisher Williams, Portland, Oregon]

All project data cited from *http://www.millenniumbulkeiswa.gov*

RESIDENT OF PND 45 YRS

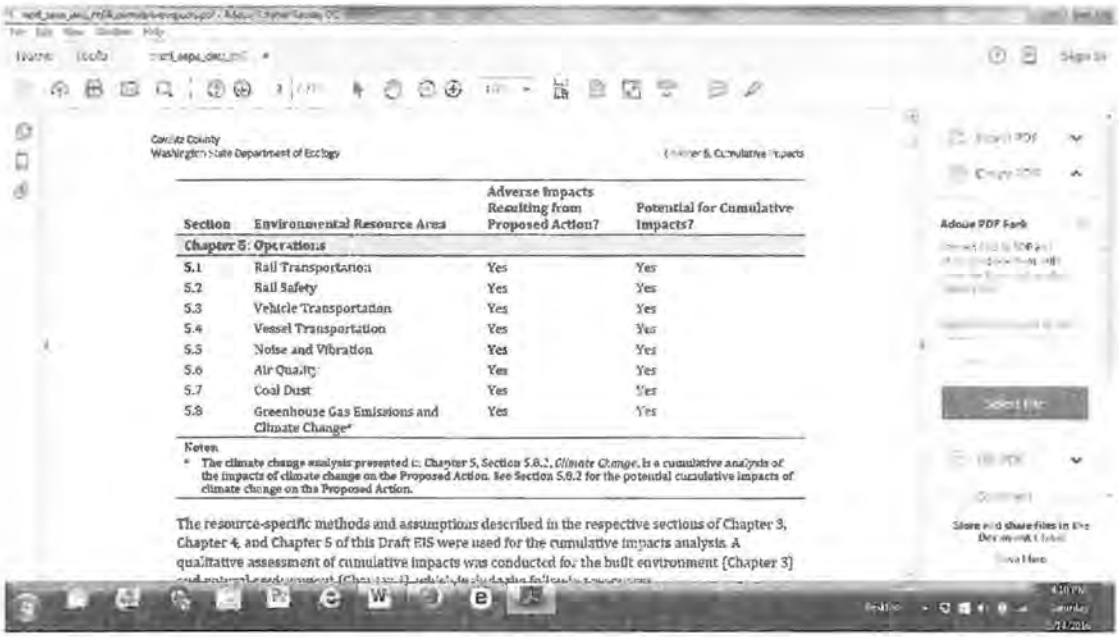
IMPACTS - are considerable when all relevant factors are fully included. Regrettably, the DEIS falls short despite its length.

- DEMANDS: water, fire protection services - considered minor in this DEIS which also identifies expansion potentials on this site and intensification of industrial uses, i.e., oil trains, pointing to possibility of future conversion if Asian demand for coal drops.

- DETRIMENT to Tribal fishery {dredging for coal vessels; GAP: coal contamination from train volume + loading of vessels - their rights are protected by treaty, as the original inhabitants of the Gorge region.

- MAJOR SHORTCOMINGS:

Specifically, **Rail Cumulative IMPACT 2038; Coal dust health effects; Credibility of applicant.**



Cowlitz County
Washington State Department of Ecology

Section	Environmental Resource Area	Adverse Impacts Resulting from Proposed Action?	Potential for Cumulative Impacts?
Chapter 5: Operations			
5.1	Rail Transportation	Yes	Yes
5.2	Rail Safety	Yes	Yes
5.3	Vehicle Transportation	Yes	Yes
5.4	Vessel Transportation	Yes	Yes
5.5	Noise and Vibration	Yes	Yes
5.6	Air Quality	Yes	Yes
5.7	Coal Dust	Yes	Yes
5.8	Greenhouse Gas Emissions and Climate Change*	Yes	Yes

Notes:
* The climate change analysis presented in Chapter 5, Section 5.8.2, *Climate Change*, is a cumulative analysis of the impacts of climate change on the Proposed Action. See Section 5.8.2 for the potential cumulative impacts of climate change on the Proposed Action.

The resource-specific methods and assumptions described in the respective sections of Chapter 3, Chapter 4, and Chapter 5 of this Draft EIS were used for the cumulative impacts analysis. A qualitative assessment of cumulative impacts was conducted for the built environment [Chapter 3]

- **RxR traffic route capacity**

2016 estimated 30 to 75 now. **2038 estimates: 96 to 138**

[PASCO to Vancouver 96 trains per day {from 41} Spokane to Pasco 138 {from 38}]

GAP #1: OREGON impact Columbia Gorge

Quote: "Loaded UP trains from the Uinta Basin in Utah and Colorado and the Powder River Basin in Wyoming would move via the UP main line through Salt Lake City and Pocatello following the Columbia River on the Oregon side to North Portland Junction in Portland, Oregon. From North Portland Junction, trains would cross the Columbia River and move on the BNSF main line to Longview Junction. All loaded UP trains would operate on the same track between Longview Junction and the project area as described for loaded BNSF trains."

* ARE WE NOT NEIGHBORS?

GAP #2: Vehicle queueing - 1.75 to 7.75 minutes delays at crossings. The emissions from idling car engines is not just exhaust but

- **a source of greenhouse gases, as we know, and a factor in climate change**
- **a contaminant that affects the air quality for Longview residents**

* THEY'RE OUR NEIGHBORS - WE CARE ABOUT THEM.

GAP #3: The Coal dust from 25.6 loaded trains per day should be shown in its cumulative for project years. It is now cited for MONTHLY emissions. Dishonest GAP; DEIS should show us the entire range of months till 2038.

GAP #4: The Health impact of coal dust especially should be shown for project years and volume of trains till 2038. Most glaring and quite unbelievably, the DEIS limits itself to "look and cleanliness factors" not the health of residents and the environment.

GAP #5: There's no examination of the applying entity, its liabilities (lawsuits) and its related concerns, i.e., Resource Capital Fund which has taken control of Ambre Energy.

Resource Capital Funds is a private equity fund with offices in Denver, New York, Canada, and Australia, registered in the Cayman Islands for tax purposes.

- Its investors [anonymous] should be considered deadbeats; they freeloaders who do not pay their fair share of taxes in America or elsewhere.
- They are unlikely to have a commitment to the people of Longview or the region as typically venture funds look only to short term return on their investments. They cash out, leaving behind pollution and stranded assets. They do not mind showering Longview with coal dust. Their game is ROI, plain and simple.

ADENDUM

[from Sightline Institute's February 2013 report], **Ross Bhappu's risky bet on coal exports** [Ambre Energy: Caveat Investor]: Ross Bhappu has played a quiet but key role in coal export proposals in Oregon and Washington by bankrolling Ambre Energy, the financially shaky company pushing coal exports on the Columbia River. Ambre Energy has a 62% stake in a coal export proposal in Longview, Washington, which the company hopes will one day export more than 40 million tons of coal each year - although the subsidiary pushing the project was caught misleading state officials by claiming that it would only ship 5 million tons a year. Ambre is also behind the Morrow Pacific coal export proposal, a project that would barge coal down the Columbia River and thereby face unusually high costs, according to a report from the Sightline Institute. Ambre Energy has a 50% stake in the export-oriented Decker coal mine in Montana, which has suffered losses and layoffs in recent years and has been the subject of lawsuits between Ambre and co-owner Cloud Peak Energy.

In addition to his role on Ambre's board of directors as a non-executive director, Ross Bhappu is a partner at Resource Capital Funds, a Denver-based private equity fund that recently increased its control of Ambre Energy. Ross Bhappu's critical role in financing Ambre Energy was detailed in the

'The decline of US coal demand has sparked renewed interest in exporting American coal to Asia. One of the highest-profile players in the coal export arena is an Australian firm called Ambre Energy, which is planning two controversial export terminal projects on the Columbia River in Washington and Oregon. But the coal export debate has largely overlooked a curious fact: Ambre Energy barely qualifies as a coal company. The company's annual reports reveal that the Australian-based venture has never made a profit, and has virtually no successful track record in coal mining or coal exports, either in the US or abroad. Worse, an in-depth look at the company's financial statements, as well as public records of other companies that have done business with Ambre, reveals a firm with deeply troubled finances, including:

- **Minuscule revenues**: the firm has collected only $6.6 million in worldwide revenues over the past 7 years.
- **Massive losses**: Ambre has accumulated $124 million in losses on its balance sheets.
- **Failed Australian venture**: The firm recently admitted that it lost $10.9 million on a failed coal project in Australia.
- **Huge liabilities**: The company is on the hook for hundreds of millions of dollars for mine reclamation and site cleanup, retiree medical and pension benefits, and costs arising from a recent legal settlement.
- **Troubled assets**: Ambre may see little value from some of its assets, including a $65 million bond cash holding dedicated for mine reclamation, and $19 million in shale oil development costs.
- **High borrowing costs**: The company has taken out multi-million dollar loans with annual interest rates of at least 10 percent, and a "balloon" loan charging 12 percent interest.
- **Massive capital needs**: Ambre needs to raise about $1 billion to bring its coal export plans to fruition.

Potential investors in Ambre, as well as the communities and businesses hoping to benefit from the firm's business, would be wise to consider Ambre's finances and troubled history before committing money or other resources to the company's export ventures.'

RCF is listed as a member of the National Mining Association, which has led efforts by the coal industry to lobby against rules to reduce carbon pollution, regulations to protect mine workers from coal dust, and other coal industry priorities. Resource Capital Funds boosted its involvement with coal export proposals in November 2014 by taking control of Ambre Energy's coal mines and export proposals. - See more at: http://www.polluterwatch.com/resource-capital-funds#sthash.aXt4PQib.dpuf

Resource Capital Funds is pushing controversial coal export proposals that would disrupt communities in the Pacific Northwest, fuel climate change and air pollution, and interfere with tribal fishing rights on the Columbia River.

Resource Capital Funds is a private equity fund with offices in Denver, New York, Canada, and Australia - though it is registered in the Cayman Islands for tax purposes. The company has played a quiet but important role in the coal industry's efforts to export coal to Asia by bankrolling Ambre Energy, the company behind the Millennium Bulk and Morrow Pacific coal export proposals in Oregon and Washington. But while some investors like Goldman Sachs have dropped their support of coal exports amid a declining global coal market and widespread community opposition, Resource Capital Funds has done just the opposite - in November 2014, it boosted its involvement by taking control of Ambre Energy's coal mines and export proposals.

x-x-x

30 Apr 13 Cayman Islands limited partnership not a US resident for treaty purposes - Resource Capital Fund
The Federal Court (Edmonds J) has held, contrary to submissions made by the Commissioner, that Resource Capital Fund III LP ("RCF"), a limited partnership formed in the Cayman Islands, was not a resident of the United States of America ("US") for the purposes of US tax and, accordingly, was not a resident of the US for the purposes of the double taxation agreement between Australia and the US ("the Convention").
It followed that Article 13 of the Convention (the "alienation of property" article) did not authorise Australia to tax a gain derived by RCF in the 2008 income year on the sale of shares in a company ("SBM") that carried on a gold mining enterprise on mining tenements situated in Australia.
In contrast, Edmonds J held that the gain was taxable to the US resident limited partners under the Convention, none of whom were parties to the litigation. His Honour said at paras 76-78 of his judgment:
"...I am of the view that while Art 13(1) of the Convention authorises Australia, by its domestic law, to tax the US resident limited partners in RCF on their respective distributive shares of the gain derived by them on the sale by RCF of the shares in SBM if its requirements are otherwise satisfied, it does not authorise Australia to tax that gain to RCF, the limited partnership, as a non-transparent company.
It follows, in my view, that there is an inconsistency between the application of the Convention and the application of the Assessment Acts as to the entity or entities to be taxed on the gain derived on the sale of the SBM shares. In accordance with the provisions of s 4(2) of the Agreements Act, that inconsistency has to be resolved in favour of the application of the Convention to the limited partners in RCF against the application of the Assessment Acts to RCF, the limited partnership.
I would therefore answer the first issue – yes: the issue of the Assessment to RCF is precluded by the Convention."
Although unnecessary to consider the Commissioner's alternative argument in relation to s 855-10 of ITAA 1997, his Honour went on to hold that the sum of the market values of SBM's taxable Australian real property (TARP) interests did not exceed the sum of the market values of SBM's non-TARP assets at the relevant dates at which shares in SBM were sold. On this basis, the gain was to be disregarded under s 855-10.
RCF's appeal against the Commissioner's deemed objection decision was upheld.

x-x-x

In late 2008, an investment group led by two private-equity firms, Resource Capital Funds and Pegasus Capital Advisors, commodities trader Traxys Group and Goldman Sachs paid $80 million to purchase a long-forgotten unit of Chevron called Molycorp. "It looks fantastic on paper," said 50-year-old Ross Bhappu, Molycorp's chairman and a partner at Denver-based Resource Capital, who notes that "we still need to realize the investment.
--------- Environmental Leader David Crane Joins Pegasus Capital as Senior Operating Executive ---
http://www.greentechmedia.com/articles/read/david-crane-steps-down-as-nrg - resigned from nrg energy (investors were looking for short-term stock performance, not long-term investment prospects in distributed energy.)

Pegasus Capital Advisors, L.P. is a private, alternative asset management firm founded [1996] and led by Craig Cogut*). Our principal investment theme is providing strategic growth capital to companies within the middle-market focused on global resource scarcity, particularly energy, waste, food, water and health & wellness. Pegasus seeks to create fundamental value through its creative investment structures while leveraging its operational expertise and deep industry knowledge.

Submission Number: ***MBTL-SEPA-DEIS-0000742***

Received: 5/23/2016 1:49:40 PM
Commenter: John Williams
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I would like to contribute to the public commentary on the Longview port proposal and voice my support. Please support this proposal and help get this project moving. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. There might not be many who know how much coal is used in everyday occurrences, but for those who do, know Millennium's project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both. Thanks for reading my comments.

Submission Number: ***MBTL-SEPA-DEIS-0000745***

Received: 5/23/2016 1:52:52 PM
Commenter: John Williams
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study should move forward in a timely manner. Please allow me to provide my comments in regards to the draft EIS. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

Submission Number: ***MBTL-SEPA-DEIS-0001849***

Received: 6/2/2016 6:00:47 PM
Commenter: John Williams
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. The economy depends on trade. It creates jobs working the railroads and ships, loading cargo at the ports, growing crops for export, and building the infrastructure necessary to support a trade-based economy. However, trade depends on permitting approval to construct this infrastructure. If the federal, state, or local government apply different permitting standards to projects exporting coal, they are creating a dangerous precedent that will make it hard to build new infrastructure needed to export other goods, like wheat or manufactured products. The environmental groups have a long history of challenging trade based projects in the northwest, such as Columbia river dredging, new rail facilities and/or export terminals. Governments shouldn't threaten trade or the jobs that depend on it. It is important that regulatory agencies keep the playing field level by being fair and consistent. The permitting process for this coal export terminal should be similar to other export terminals.

Submission Number: ***MBTL-SEPA-DEIS-0002306***

Received: 6/9/2016 5:05:10 PM
Commenter: John Williams
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close and move on to a permit decision. Coal exports are a huge opportunity for the Northwest. The infrastructure coal companies are creating will expand trade of all kinds, from apples to software. At a time of increased competition from both West and East Coast ports, Washington needs to seize these opportunities to expand trade and create thousands of family-wage jobs. Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Submission Number: ***TRANS-PASCO-M1-00020***

Received: 6/2/2016 12:00:00 AM
Commenter: Rachel Williams
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Rachel Williams and I live in Richland, Washington. I've been a resident of Washington state all of my life. Moved here about a year and a half ago and have enjoyed this community. I am for the building of the Millennium Bulk Terminal. I feel like our state could really use the tax revenue -- the jobs that come with it. I know my family's been through hard times before, and they had to struggle to make ends meet. And I think it's just kind of a no-brainer. I think it's going to meet all the environmental standards and all the testing that's been done. And I think it will be a great thing for us. And that's it.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002238***

Received: 6/8/2016 3:34:36 PM
Commenter: Raymond Williams
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

At the Public Hearing/Open House held in Pasco, WA, on June 2, I was able to testify against the proposed rail terminal in Longview, WA. My concern was the safety of rail traffic on the proposed route along the Columbia River. I sited my personal experience with the Railroad industry working on a project called Rail Garrison. Rail Garrison was a proposed USAF strategic weapon system that was based on a rail car for transporting the 190,000 pound Peacekeeper ICBM and launch canister. Two missile cars, a control car, a diesel fuel tank car, and a box car of supplies were to be pulled by two nuclear effects hardened locomotives. This rail configuration required a battery of development tests that were conducted by the Transportation Test Center in Pueblo, CO. Testing was to confirm that the wheel flange loads generated by pulling the on a curved section of track were not exceeding the limits set for conventional rail track. Excessive flange loading is the key to derailments. The Draft EIS dose not assess this safety factor and states that the proposed coal train is like any train that is now used on BNSF track. What is missing is an analysis of the repeated loading of many mile-long coal trains fatiguing the rail system. On June 4th, a train pulling oil tank cars derailed on the tracks along the Columbia River in the town of Mosier, OR. I has been stated that the cause was a failure of the rail system (track support). Oil car traffic has been much higher than normal on this line over that last few years, and even though the tracks were recently inspected, fatigue played a part. Mosier is on a curved section of track. These curved sections generate flange loading. Long trains and frequent runs will eventually cause a derailment. One other area covered by the DEIS is Vessel Transportation safety. The Columbia River has a shipping lane therefore it has been deemed safe for shipping coal. However, with Longview, WA, located between the Columbia Bar and Portland, OR, this area on the Columbia River will see two ships being loaded per day. The 35 mile stretch of the river will see two additional ships heading to Longview and two additional ships traveling to Longview. The DEIS does not evaluate the area for traffic safety. Another environmental issues not address is the aquatic invasive specie (AIS) impact, and the impact to the fisheries of the Columbia River. These coal ships will be coming from Asian ports and will be ballasted with sea water loaded in these Asian ports. If required to dump ballast, it must be done at sea. If not done correctly, ballast water will be over boarded in the Columbia. AIS issues are being taken seriously by the states of Washington and Oregon. The State Parks in Washington is looking at the impacts of recreational boating to AIS issues. We need to assess the impact of 800 additional ships per year from Asian waters will have on the Columbia. I believe that a quality analysis will reveal that shipping coal from Montana and Wyoming to Longview, WA, is not sustainable when environmental issues are addressed. The rail system needs to be upgraded with reinforced concrete rail ties; and limited in car length (additive to flange loading). Ships should be AIS inspected prior to entering the Bar, just before the Pilot is brought aboard. Thank you for allowing me to comment on this proposal. The environment must protected, even if there is local economic gain. If there is a derailment, the costs will exceed greatly over years of economic gain. If the derailment in Oregon this June had burnt down the town or spilled the cars contents into the Columbia, the cost would be beyond Millennium's assets and costly to the economics of the area in property and resources losses. I will comment on the obvious impact to the effort to curb or reverse Global Warming. Providing cheap coal is a negative to the economic gains that bestow us as world leaders of clean energy.

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☑ Air Quality
- ☐ Human Health
- ☑ Rail Transportation
- ☑ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☐ Greenhouse Gas
- ☑ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☑ Water Quality
- ☐ EIS Regulatory Process
- ☐ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

THE EIS DOES NOT ADDRESS THE IMPACT TO THE INCREASE IN RIVER SHIPPING ON THE COLUMBIA RIVER. THE STATE OF WA IS CONCERNED ABOUT AQUATIC INVASIVE SPECIES (AIS) IN THE WATERS. THE COAL SHIP WILL BE RELEASING THOUSANDS OF GALLONS OF BILGE WATER INTO THE COLUMBIA RIVER & THIS WILL GREATLY IMPACT AIS TO THE COLUMBIA

(additional space is provided on the back)

(comment continued)

THE VOLUME OF SHIPPING WILL ALSO IMPACT BOATING SAFETY IN THE RIVER AND AT THE COLUMBIA BAR. ~~THERE~~, THEY ESTIMATE 2 SHIPS PER DAY BRING LOADED. THAT MEANS 2 SHIPS ON THEIR WAY IN AND TWO SHIPS GOING OUT. THATS 6 SHIPS TOTAL.

THESE SHIPS WILL ALSO POLUTE THE AIR QUALITY WITH THEIR DIESEL ENGINES IN THE AREA OF PORTLAND, OR, AND VANCOUVER, WA.

FISHING WILL ALSO BE IMPACTED WITH A CHANCE OF PACIFIC SALMON.

SUBMITTED BY
RAYMOND WILLIAMS
PASCO, WA

Submission Number: ***TRANS-PASCO-M1-00023***

Received: 6/2/2016 12:00:00 AM
Commenter: Raymond Williams
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm Raymond Williams (phonetic). I'm a resident of Pasco, and I'm against this project. And one of the reasons I am is I -- it's been 25 years ago I was with a program when it moved its -- carrying 50 Peacekeeper ICBMs on the tracks in the country. And we had to work very hard with the Transportation Test Center to understand why a simple rail car that we designed derailed in the middle of South Dakota. When you take a train this length and run this number of trains, I don't see anything that says they upgraded these tracks. Burlington Northern Santa Fe, it shows a nice program on TV showing their train. I noticed that they added reinforced concrete ties. These railroad ties that are out there are old train technology that is used today. They date back to the Civil War days. It's one of the reasons the Transportation Test Center was built to make sure that the antique train systems that we have will stay on the track. All we did was design a tank car, a simple tank car and it derailed due to the destruction of the car and the fact it was being towed by a single locomotive.

I'm not too sure that climate change can ever be changed if we send a message we're going to export our coal to foreign places that are not set up to make that a clean system. And when they decide they don't need this cheap coal and they cannot afford to burn it without an environmental impact, they are going to shut it off, and we're stuck cleaning up.

Derailment is a big thing on the Columbia River. I don't think anybody is set up to take care of a rail car that dumps into the Columbia River with a load of coal.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002889***

Received: 6/13/2016 3:00:20 PM
Commenter: Robert Williams
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002893***

Received: 6/13/2016 3:02:00 PM
Commenter: Robert Williams
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001370***

Received: 5/26/2016 7:23:31 PM
Commenter: Steve Williams
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Millennium Bulk Terminals has proposed a coal export terminal at Longview that is both environmentally-sound and economically beneficial. I ask that you approve this project and the environmental study without delay. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. Thank you for letting me submit my opinions and show my support for the project.

Submission Number: ***MBTL-SEPA-DEIS-0000846***

Received: 5/24/2016 12:47:00 PM
Commenter: David Williamson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to state my opinions on this important issue. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. I appreciate you considering this feedback. Sincerely, DAVID WILLIAMSON dawmson2@hotmail.com 98632

Testimony

May 24, 2016

Millennium Bulk Terminals

Harvey Williamson
Harvey Williamson
8535 Ocean Beach Hwy

Longview Washington

As a third generation white resident of Cowlitz County, I would like to state my opposition to Millennium Bulk Terminal's proposed coal shipping facility. My family participated in the destruction of the old growth forests, the destruction of the salmon runs, and the destruction of a free flowing Columbia River.

I have learned from my fore-family and I do not want to see our coastal waters acidified from air pollution from the prevailing westerly winds from Asia. I do not want to see the timberlands acidified from air pollution carried on these same prevailing winds. I do not want my national government to subsidize, at belly robbing rates, to help make Wyoming coal cheap to extract. Yet Wyoming coal can be sold at hundreds of times profits to line the pockets of private enterprise.

We are doing better! The coming of a truck trailer manufacturing facility *is* doing better when it creates over twice as many permanent jobs as Millennium will produce. It takes recruiting and it takes the community to be involved in bring clean businesses to this town. And we didn't even know these jobs were out there.

We need to use our imaginations to bring good work to our county. Grasping at proverbial brass rings of extractive commodities like coal, oil, and timber will not work any longer.

Millennium Bulk Terminals has another entity which deals with real bulk products perhaps once it is divested of the coal companies, Millennium Bulk Terminals can turn its attention to the processing and exportation of agricultural products,

and the importation of raw materials to feed the productive American export economy.

Submission Number: ***MBTL-SEPA-DEIS-0002128***

Received: 6/7/2016 5:21:51 PM
Commenter: John Williamson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the agencies offering this opportunity to comment on Millennium Bulk Terminals DEIS. The port at Longview will bring many good paying jobs to Washington and will encourage the development of our natural resources nationwide, helping to lift us out of our current nationwide economic depression. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium's proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Williamson, John (2129)

Submission Number: ***MBTL-SEPA-DEIS-0002129***

Received: 6/7/2016 5:21:51 PM
Commenter: John Williamson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the agencies offering this opportunity to comment on Millennium Bulk Terminals DEIS. The port at Longview will bring many good paying jobs to Washington and will encourage the development of our natural resources nationwide, helping to lift us out of our current nationwide economic depression. Coal is not toxic especially in regards to the elements / minerals contained in coal. Coal is not toxic in water coal is not soluble and chemical bonds are only released through burning. The DOE approved water treatment facility at the old Reynolds aluminum site (now MBTL) has large water filters that contain anthracite coal to clean the water. The final water polishing step before being discharged to the river is coal and has been for decades. No further study is needed! In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium's proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0001247***

Received: 5/26/2016 6:17:31 PM
Commenter: Lindsey Williamson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the opportunity to weigh in on this development project in Longview. Too often, projects that promise historic economic opportunity like Millennium Bulk Terminal get lost in cumbersome procedures and bureaucratic delays. This is unacceptable. Our communities need to foster economic growth when it comes knocking on our door. This project has the ability to deliver this, and has earned a fair and detailed draft EIS after five long years.

Submission Number: ***MBTL-SEPA-DEIS-0001246***

Received: 5/26/2016 6:16:46 PM
Commenter: LORI WILLIAMSON
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for this opportunity to voice my support of Millennium Bulk Terminals - Longview project. This port will benefit the economy of the region, and that of the nation. Basic economic principles already tells us that not one ton more of coal will be used globally because of exports at Millennium; supply routes have no effect on demand. Keep it realistic. Keep it local. Thank you for the opportunity to comment on the process and for considering my input as you begin reviewing this project.

Submission Number: ***MBTL-SEPA-DEIS-0001882***

Received: 6/2/2016 6:27:55 PM
Commenter: Michael Williamson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. This draft EIS is exhaustive and quite frankly, overreaching. For instance, because the proposal is a terminal proposal, the use of the bulk commodity by a third party is a superseding and intervening cause to the combustion of coal. As a result of these superseding causes, the construction and operation of the terminal is not a proximate cause of the combustion of coal. Enough already! I appreciate you considering this feedback.

Submission Number: ***MBTL-SEPA-DEIS-0001244***

Received: 5/26/2016 6:15:39 PM
Commenter: Taylor Williamson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. Please commit to a timetable for the issuance of a final EIS. Ecology's SEPA Rules require a final EIS to be issued as close as possible

Submission Number: ***MBTL-SEPA-DEIS-0001245***

Received: 5/26/2016 6:16:16 PM
Commenter: TRAVIS WILLIAMSON
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Here are my comments on the Millennium coal export terminal. I support the project and the jobs and tax revenues it will provide. Regulators have been looking at this project for years, and it’s time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments it’s time to let it. Cowlitz County is fraught with uncertainty. Millennium’s proposal, however, offers all the economic benefits of a long-term port facility without any of the uncertainty. Coal is needed by other countries to help shape their future and enhance their quality of life. Let's give other countries the living standards we have for ourselves.

Submission Number: ***TRANS-LV-Q2-00011***

Received: 5/24/2016 12:00:00 AM
Commenter: Willie
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Willie. I'm against coal. I grew up in Yakima where there was coal. And I'm from the old school where the coal came down through the canyons, and it was plastered all over everything -- the canyon walls, with very fine coal. I know they have done studies on the other side, the people for coal, but they need to do, I feel, common everyday testing. I live near 32nd Avenue. And when they explained that the fine, fine dust is not going to go anyplace because they're going to separate it, whether it's with water or other chemicals in it, or whatever -- but it will be in the air. If you go out and just put a dish of water on the ground, overnight in front of the garage door with no trees around, the following morning you still have all this ash and pieces of stuff that was in the air from all the dock things from Weyerhaeuser and/or places like that, and it's in the dish of water. Well, I think they need to do a common-day test and see how much more coal dust is going to be processed in the air, during wind storms or rain and be all over our cars and our plants and so forth. That's -- I guess that's it. I just want a common -- you know everything that they have is in a general theory. And we -- as people all they can give us is general information. There's really no way of testing what's going to happen until it does happen. And by that time we could be done in as a community with traffic being stopped all the time. How are you going to get the ambulance through? You're going to have to unhook the cars and let them through. But I think they just need to use common- sense testing rather than -- rather than what they've seen on other places.

4402 Y Road
Bellingham, Washington 98226

June 13, 2016

Cowlitz County Department of Building and Planning

Washington State Department of Ecology

Re: DEIS, Millenium Bulk Terminals at Longview

Dear Co-Lead Agencies:

Please accept the following comment letter on the proposed Longview coal terminal. I acknowledge the stupendous effort you and your staffs have put into the EIS; it is much appreciated. I do have a few comments to offer on the EIS.

Chapter 2 P. 15. This section reports peak water usage estimates for the terminal but does not report average or yearly estimated water consumption. The EIS should do so, because long-term consumption and discharge are equally relevant figures for public sector water planning. This discussion should be related to the discussion of climate change in chapter 5.8.

Chapter 2 P. 18. Pre-loading aggregate: only the sketchiest outlines of this process have been included. The EIS needs to be specific about what kinds of material will be obtained, where from, how much diesel smoke will be generated in moving it with 753 barges the first year, noise and air pollutants to be generated over several years in the process of moving the material around the site from one pad to another, effects on communities through which the aggregate will have to pass. This will be a massive, prolonged, and devastating disruption to the Longview and neighboring communities. Its effects should not be minimized.

The EIS estimates up to 70 vessels per month will visit the site at full build-out. This means 140 new ship transits per month from the Columbia River Bar up to Longview – not counting the two or three tugs assigned to ship assist work every time a cargo carrier arrives or departs. Chapter 5.4 p 34 runs these numbers out to yearly, 1,680 ship transits. Most of these ships will be Panamax class, 100,000 deadweight tons and up, drawing 49.' This is a huge negative qualitative and quantitative impact on current river traffic that cannot be mitigated. The EIS p. 5.4-38 identifies known difficulties berthing cargo ships at Dock 1, but says there is no way to evaluate the difficulty without building the terminal and finding out by trial and error. This is not an acceptable or satisfactory planning approach. Cargo ship movements will dominate river traffic to the virtual exclusion of other traffic. The EIS needs to put this impact into some comprehensible terms for the lay reader rather than burying it in statistics or masking it as indirect impact.

Risk of bunkering fuel spills is highly contingent on human error. This risk cannot be reduced to zero, best practices notwithstanding. 5.4-44. The status of bunkering at Dock 1 is not clear, or at least I could not find it.

5.5-2 noise and trespass light from anchored or docked ships: they run generators 24/7. This source of noise and trespass light should be assessed in the EIS. So should mitigation measures, such as darkening ships after sundown and using full-cutoff lighting on deck (per International Dark Sky Association standards).

Coal dust mitigation 5.7-26 no mention of covered coal cars, an obvious mitigation measure for coal dust suppression. The EIS needs a discussion of its feasibilty, and if it is not feasible, why not.

Thank you for considering my comments.

Sincerely,

Peter Willing

Submission Number: ***MBTL-SEPA-DEIS-0002746***

Received: 6/13/2016 2:07:12 PM
Commenter: Elaine Willman
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. The decision to go forward or not, with The Millennium Bulk Terminal is a metaphor for the Do or Die status that America's economy is currently in, and it's indicative of the primary issue of the upcoming presidential election. Is America going to take care of its economy or not? Or will we look to the job-creation needs of ALL Americans, the responsibility of our federal, state and local agencies to ALL Americans, and not one tiny segment (Native American) whose inordinate ability and desire to wield power over all others has taken many industries in Washington State and other states completely off of our economic table, (i.e. fishing, tourism, hunting). To let one single ethnicity now control the future of our energy and economy is not just discriminatory; it's a criminal assault upon the quality of life of all other Americans. It's not cultural theft of one tribe's ancestral lands. It's cultural theft of the future of America. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0001765***

Received: 6/2/2016 4:45:19 PM
Commenter: Ivan Willson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The post reads "to create jobs" how about we keep the jobs we have AND create jobs by opening the port. My young family needs my income to live. Without the mine a lot of people will be out of work. I am more then happy to work and do are all the people employed at Decker Coal. Please help us continue our mines life by opening these ports.

Submission Number: ***MBTL-SEPA-DEIS-0002733***

Received: 6/13/2016 1:54:47 PM
Commenter: A.G. Wilson
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am in 100% support of this bulk terminal. It's a way of using existing property in a basically rural area and utilizing cheap transportation, rail and water. It's a win - win for every one. Lots of jobs in mines port facilities, as well as all the usual support for these businesses: miners, mechanics, management, parts, railroaders, and on and on. Let's do something that would be a great economic boon and put people back to work.

Submission Number: ***TRANS-LV-Q3-00008***

Received: 5/24/2016 12:00:00 AM
Commenter: Al Wilson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
My name is Al Wilson. I started working in this area back in 1975. I've lived here in the area since 1988.

There was jobs enough for two and three shifts of work, and 10, 15 mills down here in the area. And all kinds of exports, of course import business, and lots of opportunity in this community. One of the reasons why I came here.

Today I see two and three families living in small houses because they don't have jobs, they can't afford the rent. And the basic part of it is, is jobs have been taken away because of the EPA, because of the nature conservancy, the fish control, the consumer activists, high taxes, all kinds of limitations and control. Too many people are still in the attitude here of what's mine I don't want to share with anybody else.

We have four million people come of age every year in the United States. We need jobs. It's not just here, it's everywhere. We need to have opportunities for these people so that they can have their own families being taken care of.

One of the big problems we have today is they're saying no coal. Okay, but they're also saying that we can do better. How's that?

Wind control and solar has been given so much money to get started and then they can't make it a business model that pays for itself. And of course they make our PUD pay extra money for it and they've passed laws so that we have to buy the product from them. And that just then ups our costs to everybody else. So not only did we give them money to get started, we're subsidizing them, and then individuals in our own homes have to pay the extra higher bills.

You know, building a house in the Gorge is practically impossible to be able to do. But we can put up windmills and we can put up solar stuff. Now where is the justification in that? We need to be able to produce.

The challenges are, you know, just of expanding exponentially. We have 19 billion dollars in debt. We still import more things than we export. We have 95 million people that are out of work, if they can get a decent job. And right here in Cowlitz County it's close to 30 percent of the people that would work if they could.

Now don't get me wrong, we've got drug problems and we've got other problems, and I'm aware of that. We've got people that can't pay the deductible on the medical to get medical, so once they get it for free. We've got challenges that the only way we can make this right is to have jobs.

If we've got a problem with dust, then the EPA needs to do its job. They've got one of the heaviest hammers there is in the marketplace on businesses. They even control the amount of rain that comes down and what we have to pay because we get rained on on our particular piece of property.

We are in a situation that the jobs that some were talking about this afternoon are only just a few. Well how about the thousands of others associated, the railroad, the coal miners, the associated jobs that come from being able to have the workers putting stuff together and everything. I'm a small business guy, I have seen incomes and small businesses drop tremendously because there's not the associated income to go with it.

We need Millennium, we of other companies to expand in this particular area, and quit saying we can't just because there's some kind of a spotted owl or a guppy fish or a bird that may not be able to, gee, I think I can just go on down the street someplace else. We need to have jobs. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002735***

Received: 6/13/2016 1:55:01 PM
Commenter: Audrey Wilson
Organization:
State: Wyoming

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Sounds like this could help both the coal producer and the state with the empty buildings, giving them employment opportunities and enhancing the income for the states. Having empty buildings does the city no good and having coal to produce and not being able to ship it is not good, either. People on both ends of the proposal would benefit, and be put back to work.

Submission Number: ***TRANS-SPOKANE-Q1-00007***

Received: 5/26/2016 12:00:00 AM
Commenter: Charlotte Wilson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Charlotte Wilson and I live in Spokane, with a second home in Vancouver. I have never attended any kind of rally, but this issue has struck me so dear to my heart and my love for the environment, my concerns for my children and grandchildren, and their future.

I think that coal is the worst fossil fuel and there are alternatives. I don't think that people who would choose jobs over the health and safety of our environment, our families, realize that there are options. There are alternatives to coal. And I really -- I beg, please do not allow this coal terminal to be built. We do not need it. It scares me to death.

Submission Number: ***MBTL-SEPA-DEIS-0001451***

Received: 5/29/2016 2:17:06 PM
Commenter: Chris Wilson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

All you need to do is look at the pictures of coal pollution in China to know that burning more coal for any reason is a bad idea. Since we all live on the same planet we do not want anyone burning more coal. Yes, the jobs would be nice, but it's time we finally do something to stop damaging the environment. The increase in rail traffic through Pasco and Kennewick will cause additional traffic problems, deposit coal dust into our towns and damage our local environment. Stop any increase in coal rail car traffic NOW!!!

Submission Number: ***TRANS-LV-Q3-00039***

Received: 5/24/2016 12:00:00 AM
Commenter: Jeff Wilson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Jeff Wilson. I reside in Longview, Washington. My comments regarding the EIS are that I think the scoping was applied and overreached in its analysis as it relates to the mode of transportation.

The rail traffic restriction and impacts are coming anyway. Any time growth is going to occur in the United States that involves commodities, you can plan on increased rail traffic.

I would propose that we focus on mitigating rail traffic regardless of the cargoes and commodities, especially because the EIS seemed to far outreach the most precious cargo, and that is people.

So the EIS was so critical of railroad impacts, what about the railroad impact when the cargo is people?

I'd love to have an Environmental Impact Statement that would worry about increasing the safety of Amtrak which carries the most precious cargo called people.

As it relates to Millennium, I see no reason to prohibit any company that is going to operate in the confines of existing laws and regulations. They should be permitted to operate within those confines.

To pre-prejudice someone into an unlawful act when what they're proposing to do is still in fact legal, they must be allowed to proceed in this process.

For those that are passionate and convinced of their feelings against coal, I would offer that the direction of opposition should be instigated in another manner instead of directed at Millennium Bulk Terminal's proposed project in Longview.

In other words, if you want to legislate global climate warming or climate changes, you need to do that in another avenue rather than prohibit a legally-operating business from operating legally.

Submission Number: ***MBTL-SEPA-DEIS-0002668***

Received: 6/13/2016 12:44:53 PM
Commenter: Josh Wilson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0000466***

Received: 5/17/2016 7:36:37 PM
Commenter: Kit Wilson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The world needs coal and it might as well come from the United States. We have the resources and Millennium Bulk Terminals has a plan to make it happen at Longview. Please support the environmental study. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. It is important that regulatory agencies keep the playing field level by being fair and consistent. The permitting process for this coal export terminal should be similar to other export terminals.

Submission Number: ***MBTL-SEPA-DEIS-0000458***

Received: 5/17/2016 7:27:48 PM
Commenter: Robert Wilson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our state is trade dependent and a critical part of the import/export infrastructure of the West coast. International trade is essential to the economy of Washington and supports many family-wage jobs. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0000881***

Received: 5/24/2016 4:45:54 PM
Commenter: Sharon Wilson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Despite all the rhetoric to the contrary about coal exports, I firmly believe you can have both good family-wage jobs and be good stewards of the environment. It doesn't have to be a choice of one over the other. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn't like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. I appreciate you considering this feedback.

Submission Number: ***MBTL-SEPA-DEIS-0002928***

Received: 6/13/2016 3:17:36 PM
Commenter: Thomas Wilson
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0002960***

Received: 6/13/2016 3:33:27 PM
Commenter: Tom Wilson
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000408***

Received: 5/17/2016 6:26:52 PM
Commenter: Ty Wilson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our economy and our families are suffering. We can do something about this by supporting the proposed port at Longview that will put people to work quickly and will keep them gainfully employed for years to come. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). Thanks for the ability to comment. I believe the final environmental review needs to be released ASAP!

Submission Number: ***MBTL-SEPA-DEIS-0002228***

Received: 6/7/2016 7:39:35 PM
Commenter: William Wilson
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I've been following this issue, and am glad to have the chance to weigh in. Millennium Bulk Terminals has been a good community member in the City of Longview for the last five years. The support local charities and many of their employees are active volunteers. I believe they are a good neighbor and their environmental review should be treated like every other commodity down at the Port of Longview. We need more good corporate citizens in Longview. The agencies are doing a great job of evaluating Millennium Bulk Terminals port proposal. I am convinced that this project's permit should move forward without further delay.

Submission Number: ***MBTL-SEPA-DEIS-0001572***

Received: 5/31/2016 5:18:20 PM
Commenter: Mike Wimber
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to comment on the draft EIS for this extremely important project. I have been waiting for this opportunity for a very long time, and having now reviewed the draft EIS, I can see why it has taken so long. You have taken an unnecessarily broad scope and studied each aspect of it to death. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. The opening of Millennium Bulk Terminals proposed coal export facility will have a significantly positive impact not only on the state of Washington but the entire country. So I not only urge you to keep this permitting process moving forward at an efficient pace, but to also to accept the DEIS as sufficient. Thank you.

As a public health nurse who spent over 25 years conducting accident prevention research, I'm concerned about several health and safety issues with this proposed project. One area that hasn't been adequately addressed in this DEIS is the issue of fires and how these may cause burn injuries and respiratory problems for individuals in and near the terminal as well as people living in communities along the rail route.

As I'm sure you know, this project will be dealing with a hazardous type of coal. Powder River Basin coal is notorious for the hazards it presents regarding fires and explosions. This was a conclusion by NIOSH following an investigation into the deaths of two firefighters. They were killed in an explosion when trying to put out a fire of PRB coal.

PRB coal is twice as likely to self-combust than other types of coal. It will not only smolder and catch fire while in storage piles at power plants and coal terminals, but has been known to be delivered to a power plant with the rail car or barge partially on fire...

PRB coal dust is also a fire hazard. Sparks from machinery and heat from conveyor belts have caused major coal dust fires and explosions. The potential for fires along the entire rail route is also a concern. BNSF has stated that coal dust deposits have caused fires in areas where coal dust has accumulated. And a fire department in Wyoming has found that coal fires along railroad tracks account for at least 50% of the department's summer call volume.

Operators familiar with the unique requirements of burning PRB coal will tell you that it's not a case of "if" you will have a PRB coal fire, it's "when." Is this a risk worth taking? I think not.

The potential negative impacts of this project to human health and safety are too great!
Please incorporate discussion of these specific risks into the Health Impact Assessment. I recommend that you deny construction of this coal export terminal and select the "No ACTION ALTERNATIVE."

Diane Win RN, MPH

Submission Number: ***MBTL-SEPA-DEIS-0000527***

Received: 5/19/2016 5:30:36 PM
Commenter: Jack Winch
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close and move on to a permit decision. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough now it is time to move forward with a fair process for permitting. This is an important project that will provide a vital role in boosting the economy and one that should be allowed to proceed in as quick of a manner as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001847***

Received: 6/2/2016 5:59:06 PM
Commenter: Kendra Winchell
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I appreciate the agencies offering this opportunity to comment on Millennium Bulk Terminals DEIS. The port at Longview will bring many good paying jobs to Washington and will encourage the development of our natural resources nationwide, helping to lift us out of our current nationwide economic depression. In regards to coal dust & human health impacts: Please refer to the American Lung Association's report on state / county rankings. First please note that the incidence of pediatric and adult asthma for Cowlitz Co is 9.1%, Clark Co. is 9.0%, and Yakima Co is 8.9%. Then compare this same statistic to communities where coal is produced or shipped through such as Campbell Co WY at 9.0%, Box Butte Co, NE (Alliance) 6.96%, Lincoln Co NE (North Platte) 6.98%, or St. Louis Co MO 7.68%. Further, the ALA ranking for 24 hr particulate matter in Campbell Co WY scores a grade of B, as compared to Clark Co WA at F and Yakima Co WA at F. The evidence is obvious, coal production and transportation is not causing a health problem, but it can act as a remedy to an economic downturn. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Winey, Matt (0562)

Submission Number: ***MBTL-SEPA-DEIS-0000562***

Received: 5/19/2016 6:07:26 PM
Commenter: Matt Winey
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for this opportunity to voice my support of Millennium Bulk Terminals - Longview project. This port will benefit the economy of the region, and that of the nation. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview's quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. Please do not delay the permitting process any further. It is important to get people back to work. There are good jobs on the line and waiting on your review.

Submission Number: ***MBTL-SEPA-DEIS-0001428***

Received: 5/27/2016 3:06:45 PM
Commenter: Janet Wingenroth
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I read the Dept. of Ecology Draft Environmental Impact Statement regarding the Millennium Terminals. Given the studies findings on the cumulative impact of the facility on air quality and global greenhouse emissions I don't see how the construction of the terminal can be allowed to proceed. Furthermore the study did not take into account in the recent Paris Agreement which requires the U.S. to further consider the impact of new developments using fossil fuels on the global climate. It's likely that further development of coal resources in the U.S. will have a negatively impact worldwide efforts to limit greenhouse gasses. I hope these negative effects on global climate as well as local concerns about coal transport will be considered in the permit process.

RECEIVED
MAY 25 2016

May 25, 2016

Dear Sir,

I support the "no action" alternative in the Millennium Bulk Terminals draft environmental impact statement (EIS). Millennium's proposed coal export terminal would harm communities throughout the Northwest, with the most intense impacts felt in Longview, Washington, near the proposed terminal site. The project harms our health and safety, air and water quality, and natural resources. I urge you to protect public health and natural resources. Reject coal export.

Climate change: Washington state is a national leader in the fight to combat climate change. Considering rail and vessel emissions alone, this project would be one of the biggest greenhouse gas emitters in the state. Coal export undermines the state's hard work to combat climate change and protect future generations.

Health and the environment: The draft EIS reveals many serious impacts to human health and the environment. It dismisses other impacts without a valid basis. The final EIS should incorporate the best available science, real-world examples, and a comprehensive health impact assessment. The agencies undercut public, tribal, and agency input by failing to complete a health impact assessment before releasing the draft EIS.
Rail traffic: The draft EIS demonstrates that Millennium's project would have a severe impact on rail and road congestion. Because Millennium cannot fix this significant harm--from mine to terminal--the agencies should deny permits.

Weak and unenforceable mitigation: In some instances, the draft EIS claims mitigation can reduce coal dust, rail traffic and other project impacts. For example, to mitigate coal dust from the terminal, the draft EIS proposes a reporting process for coal dust complaints. This borders on offensive. A phone call or email to complain about coal dust fouling a person's lungs, home and river is not "mitigation." The agencies should revise the draft EIS and remove inadequate, unsupported and unenforceable mitigation.

Yours,

Kevin Winter

8791 Silverberry Ave

Elk Grove, CA 95624

Submission Number: ***MBTL-SEPA-DEIS-0000609***

Received: 5/19/2016 7:02:35 PM
Commenter: Al Winters
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Our state is trade dependent and a critical part of the import/export infrastructure of the West coast. International trade is essential to the economy of Washington and supports many family-wage jobs. Right off the bat, Millennium began working with the Department of Ecology to clean up the old Reynolds smelter site. In addition Millennium is working to restore the natural habitat along the Columbia River, it has removed and replaced old pilings, and has brought the existing dock up to minimum standards. Why has this project's permits for the export terminal taken so long? All this delay has done is postpone the cleanup and restoration of a great industrial port site. Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done!

Submission Number: ***MBTL-SEPA-DEIS-0002408***

Received: 6/9/2016 6:16:39 PM
Commenter: Al Winters
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. Thank you for your consideration. I look forward to seeing this project come to reality.

Submission Number: ***MBTL-SEPA-DEIS-0001334***

Received: 5/26/2016 7:05:36 PM
Commenter: Bruce Wirkkala
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed Millennium Bulk Terminal would provide. The project would create work right away during construction, and plenty more jobs would stay around to run the terminal. Plus, all of those wages generated would trickle back into our local and state economies. At a time when our state unemployment rates are below the national average, we cannot miss big opportunities for new business like this one. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0000618***

Received: 5/19/2016 7:33:14 PM
Commenter: Gregory Wirtel
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I am writing today to express my support for the Millennium Bulk Terminals project in Longview. I am glad for the opportunity to voice my support of this important project. Ultimately, global warming and the impact of fossil fuels on the environment are national government and international government issues and did not need to be studied in this DEIS. Now that it's done, let's move on to the final EIS! I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Submission Number: ***TRANS-LV-M2-00034***

Received: 5/24/2016 12:00:00 AM
Commenter: Allen Wise
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allen Wise (phonetic), Cowlitz County. Where we are here now was once a small town of Freeport, Washington. It was founded in 1866 when coal was king in an industrial world. Freeport no longer exists and coal has become a scourge of a ecological responsibility that we owe to the future.

The Millennium undertaking doesn't pass muster. There appears to be no shortage of cheerleaders who want to take Chinese families wearing masks and make them insignificant. I've breathed that air too. The CEDC lacks leadership to bring good jobs to our community.

It's time to move on from buying ad space, T-shirts, and barbecues on the public dime and seek needed 21st Century industrial jobs on our valuable riverfront. Our newspaper publisher must not read the newspapers. Doesn't he know that climate change, global warming, and coal dust are all real?

Carbon measured in millions of tons won't do. Wyoming's governor will spend up to $1 billion to ship coal from Washington. That reminds me of the tobacco industry's litigated payouts and who is getting paid under the table.

I'm tired of small-minded folks and big hats determining Lower Columbia's future. In a world of reason there is no place for coal transported and set aflame at the expense of the environment or the future of my grandchildren. Longview must never get the title of, Coal port USA.

If someone convinced you that there is any economic benefit to this misadventure, you might pinch yourself and consider this is no different than an Internet or phone scam. Because there is no difference. A scam is a scam, is a scam.

Submission Number: ***MBTL-SEPA-DEIS-0003062***

Received: 6/13/2016 5:11:32 PM
Commenter: Earl Wise
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to comment on the draft EIS for this extremely important project. I have been waiting for this opportunity for a very long time, and having now reviewed the draft EIS, I can see why it has taken so long. You have taken an unnecessarily broad scope and studied each aspect of it to death. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. This project will create additional revenue for a state that, like many others, can really use the economic boost. Through the entire construction process it will employ a significant amount of people and go a long way toward revitalizing Washington. I feel we should make this coal export terminal a reality. Thank you for considering my comments. Sincerely, Earl B. Wise Earlwise01@aol.com 360660

Submission Number: ***MBTL-SEPA-DEIS-0003161***

Received: 6/13/2016 6:12:18 PM
Commenter: Michael Wise
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***MBTL-SEPA-DEIS-0001189***

Received: 5/25/2016 9:54:05 PM
Commenter: Emily Withnall
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

According to the Draft EIS by Cowlitz County and the Washington Department of Ecology, the Millennium Bulk Terminals would increase global carbon emissions by 37.6 metric tons annually, the equivalent of adding seven new coal power plants a year. It's wrong to cause catastrophic climate change. It's wrong for companies like the Millennium Bulk Terminals to profit from the resulting environmental and social wreckage. The proposal would add 16 coal trains a day, half loaded, half empty to and from the Powder River Basin. The increased trains will exceed current capacity in Idaho and Montana, and, since the trains go through the middle of our towns and cities, the increase in coal dust and diesel fumes will adversely affect the health of all humans in residential neighborhoods next to the tracks. The wide-ranging health dangers of coal dust include exposure to toxic heavy metals like mercury, cancer, and increased rates of asthma, especially in children. A BNSF Railway study found that as much as a ton of coal dust can escape from a single loaded coal car. Other reports estimate that three percent of a coal car's load, which is typically 100 tons or more, can blow away in transit. The US Department of Transportation, meanwhile, classifies coal dust as a "pernicious ballast foulant" that can weaken and destabilize rail tracks. The draft EIS mentions unavoidable and significant delays at rail crossings near the facility but should also take into account multiple delays route-wide, from eastern Montana to western Washington. As we all know, the railroads parallel Montana's rivers. Our rivers are for the most part still wild and healthy, and they support a recreational economy second to none. Moving 44 million tons of coal a year threatens these rivers and the economy that depends on them. Finally, the overall economics of the proposed export facility are outdated. China cut its coal imports by a third in 2015. Coal prices have plummeted 62 percent in the last five years, and U.S. coal production has dropped by more than half since 2008. Some 50 coal companies have declared bankruptcy since 2012. Please reject the Millennium Bulk Terminals proposal. Thank you, Emily Withnall

Submission Number: ***MBTL-SEPA-DEIS-0003263***

Received: 6/13/2016 7:19:18 PM
Commenter: Craig Witt
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear reviewers, Please deny all permits pertaining to coal export from the Longview terminal. The implications that coal exports have on our air, water and human health are too serious to overlook. They cannot be mitigated. Climate change poses a serious threat to our planet and the burning of coal anywhere in the world contributes significantly to this problem. Again, please deny permits for the proposed Longview coal export facility. Thank you, Craig Witt

I have traveled here today from my home in Mosier in the Columbia Gorge Scenic Area to support the "no action" alternative in the Millennium Bulk Terminals Draft Environmental Impact Statement (EIS).

The other alternative would mean that an increased number of trains carrying coal in uncovered cars to this Longview, WA facility would pass near my home and many others in the Columbia River Gorge. Many of us who live in the gorge have witnessed coal dust blowing and falling off existing coal trains and contaminating the air and water. At some key sites in the Columbia River Gorge the problem is so severe that coal accumulates in inches-thick layers from the tracks to the banks of the Columbia River. Coal is being discharged directly into the Columbia River and its tributaries in violation of the Clean Water Act.

The DEIS fails to adequately consider the amount of coal dust being discharged from the trains, the impacts of this coal dust on the scenic, natural, cultural and recreation resources of the Columbia River Gorge National Scenic Area, and the clear violations of the federal Clean Water Act that would result from the project.

Coal is extremely toxic and coal dust in the air contributes to respiratory illness. My wife has personally experienced the new onset of asthma. The project harms our health and safety, air and water quality, and natural resources. I urge your agencies to protect public health and the environment by rejecting this coal export terminal. Coal export undermines the state's hard work to combat climate change and protect future generations.

While the draft EIS reveals many intolerable serious impacts to human health and the environment, it dismisses other impacts without a valid basis. I urge the agencies to incorporate the best available science, real world examples, and the Health Impact Assessment in the Final EIS.

The Columbia River Gorge National Scenic Area is just one of many protected and sensitive areas that would be negatively impacted by coal trains that would service this Longview facility. Wetlands, wildlife refuges, state parks, tribal fishing areas, critical fish, wildlife and plant habitat, recreation, and scenic resources would be harmed by the impacts of this facility, its trains, and the expansion of rail lines needed to accommodate the increase in rail traffic.

The Draft EIS demonstrates Millennium would have a severe impact on rail and road congestion. Because Millennium cannot fix this significant harm, from mine to terminal, the agencies should deny permits.

In some instances, the Draft EIS claims mitigation can reduce coal dust, rail traffic, and other project impacts. For example, to mitigate coal dust from the terminal, the Draft EIS proposes a reporting process for coal dust complaints. This is unacceptable. A phone call or email to complain about coal dust fouling a person's lungs, home, and river is not "mitigation."

I do not believe we should expose the people and the environment of the Pacific Northwest to these dangers in order to export coal to be burned in other countries many of which have very weak environmental standards.

The agencies should revise the Draft EIS and remove inadequate, unsupported, and unenforceable mitigation.

Sincerely,

~~William L. White~~

~~P. O. Box 657, Mosier, OR 97040~~

Paulette Wittwer
2316 NE Tillamook
Portland, OR 97212

Submission Number: ***MBTL-SEPA-DEIS-0000875***

Received: 5/24/2016 4:42:06 PM
Commenter: Ronald Woeste
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

In a time that has included seeing neighbors and friends out of work and under-employed, we need to encourage economic development. In my opinion, that cannot happen soon enough. That is why I am writing today. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. Thank you for the chance to make my voice heard on this very important issue. I think this project has the potential to transform the community and I hope that you will take that into account as you begin your review of the project.

Submission Number: ***MBTL-SEPA-DEIS-0000915***

Received: 5/24/2016 5:10:00 PM
Commenter: Gary Wold
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Bring the never-ending studies and ever-expanding permitting costs to a close and move on to a permit decision. Raising a family is tough, and this economy is not making it any easier. That’s why we need to capitalize on any opportunity that we have to provide good-paying jobs that can support a family. The Millennium Bulk Terminal project will create jobs that can help families give their children the head-start that they need. There are men and women throughout the state that are waiting for the chance to work hard for their families. It simply makes no sense to turn them away at this point. As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision based on the facts presented. The scope of this document should be limited to the immediate impacted areas so we can keep moving forward. Hundreds of people with families are not only waiting but depending on having the security of a long-term, good-paying job.

Submission Number: ***MBTL-SEPA-DEIS-0002997***

Received: 6/13/2016 4:27:06 PM
Commenter: Ann Wolfe
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***TRANS-LV-Q1-00034***

Received: 5/24/2016 12:00:00 AM
Commenter: Karen Wolfe
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Karen Wolfe with an E and I'm a Longview resident. A year and a half ago we had to come down to Longview for an appointment, and we fell in love with Longview because it was so clean and pretty, and this is where we chose to retire. Now our concern is that if the coal trains rumble through Montana, Idaho, Spokane, down through Tri Cities, along the Columbia to Longview and as they go along the Columbia, they're going to be rumbling over the Hanford site and shaking all of those containers of toxic materials that are stored in the ground. Then, when they get to Longview, they're going to dump all of the coal onto the ground and it's going to sit there until it's picked up again and thrown onto barges, which won't be covered or enclosed, and taken out to sea, on to China where they burn the coal. Now the fumes and smoke is going to be in the atmosphere, it's going to blow back at us. So not only are we going to have the dust from the coal, we're going to upset the toxic materials under Hanford. The site where they want to propose to do this happens to be the old Alcoa aluminum smelter site. It has not been completely cleaned up yet. EPA is on them about cleaning it up. Millennium has proven that they haven't taken care of that. Now they want to do this, and I'm just worried that they'll never follow the EPA guidelines. Plus the amounts of dust and coal and the diesel from the trains that come into our atmosphere. We live one mile from this location, and we had to move from Eastern Washington a few years back because of my breathing. So now we're going to have to move again if this happens. So that's my statement. Thank you very much.

Submission Number: ***MBTL-SEPA-DEIS-0003029***

Received: 6/13/2016 4:44:16 PM
Commenter: Tyler Wolfe
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Department of Ecology should speedily complete the permitting for Millennium Bulk Terminals. The neighboring Port of Longview owns 275 acres at Barlow Point. Cowlitz County has long recognized that upgrades to the Reynolds Short Line were desired long before Millennium presented its proposal. To serve the industrial and export terminal areas improvements to the Reynolds short line have been desired with or without Millennium’s proposal. Now that the rail corridor has been studied, now it’s time for progress on the Millennium project! Now's the time to utilize trade infrastructure. The Millennium Bulk Terminals project is one step closer to being able to participate in this vital business. Thanks to the agencies for considering my comments. Sincerely, Tyler s wolfe Tylersamwolfe@gmail.com 83815

Submission Number: ***TRANS-LV-M1-00058***

Received: 5/24/2016 12:00:00 AM
Commenter: Dr. Virginia Wolfe
Organization: Physicians for Social Responsibility
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. My name is Dr. Virginia Wolfe. I'm a retired family practitioner living in Skagit County, and I'm a member of the Physicians for Social Responsibility. Now I don't live between the Powder River or the upper basins of Cowlitz County, but there are likely many communities like mine along the rail tracks both in this state and others where the tracks run through the hearts of our towns and our rural areas and where there are fewer bank grade separations. So I want to address the emergency response delays and the increase in accident risk with the significant increase of 16 trains a day. I want to put a human face on the statistics on traffic delays that are studied on the Draft Environmental Impact Statement. Several years ago a neighbor, the husband of a dear friend of mine suffered a cardiac arrest during an ambulance transport and arrested twice more after arriving at the hospital. He survived because EMTs in that ambulance which very likely had to cross the track twice to get him to the hospital were able to resuscitate him and get him there in time. Another story happened in Bellingham, just north of me, where a young man was killed on the tracks in Bellingham, reportedly wearing ear buds and not hearing the train. How will 16 more trains a day increase the chance of that sort of thing happening again? Mitigation of these kind of impacts must include how necessary grade separations costing tens of millions of dollars each will be funded, and the likelihood that small communities in competition with each other for limited available resources can do this. Mitigations must consider that coal trains over a mile long might block several heavily traveled intersections simultaneously complicating the rerouting of emergency vehicles. In Mt. Vernon, near me, a few years ago a coal train hit a (inaudible) stalled, blocking three busy intersections for 45 minutes. These are just a few of the myriad of health impacts from this massive proposal that demand a health impact assessment to adequately address all the risks to human health and safety. Thank you very much.

Wolff, Kenneth (2366)

Submission Number: ***MBTL-SEPA-DEIS-0002366***

Received: 6/9/2016 5:49:54 PM
Commenter: Kenneth Wolff
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Moving this project forward is important to me, my family and my community. Longview is home to many undeveloped and underutilized industrial properties, including multiple locations in the Port of Longview, Barlow Point, and the Mint Farm to name a few. It will take a visionary company to come in and take on the type of cleanup and redevelopment that is needed at the old Reynold's site when it would be easier to develop on a greenfield industrial zoned neighboring property. It will be a major economic cost to the community if we DON'T have Millennium fully operational. Please reach out with any questions.

Submission Number: ***MBTL-SEPA-DEIS-0001342***

Received: 5/26/2016 7:09:27 PM
Commenter: Kenny Wolff
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete and it's time for progress. The economy depends on trade. It creates jobs working the railroads and ships, loading cargo at the ports, growing crops for export, and building the infrastructure necessary to support a trade-based economy. However, trade depends on permitting approval to construct this infrastructure. If the federal, state, or local government apply different permitting standards to projects exporting coal, they are creating a dangerous precedent that will make it hard to build new infrastructure needed to export other goods, like wheat or manufactured products. The environmental groups have a long history of challenging trade based projects in the northwest, such as Columbia river dredging, new rail facilities and/or export terminals. Governments shouldn't threaten trade or the jobs that depend on it.

Submission Number: ***MBTL-SEPA-DEIS-0001344***

Received: 5/26/2016 7:10:02 PM
Commenter: Tammy Wolff
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Allow me to voice my strong support for the proposed port at Longview. We need to move on as quickly as possible. The draft EIS is sufficient and complete â€" it’s time for progress. Millennium Bulk Terminals have been actively engaged in the community of Longview for the five years they have been at the old Reynold’s site. They are an important part of our community and economy and will do even more great work once their permits are granted. Thanks for considering my comments.

Submission Number: ***MBTL-SEPA-DEIS-0002365***

Received: 6/9/2016 5:48:15 PM
Commenter: Tammy Wolff
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Millennium Bulk Terminals proposed coal export terminal should be approved and the port should be allowed to move forward. It's good for Washington and her neighbors. Cowlitz County continues to have a high unemployment rate. We need these jobs and we've paid a high cost with this drawn out permitting process so far. It's time to stop the delay and bring about development and economic relief. Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Submission Number: ***MBTL-SEPA-DEIS-0002511***

Received: 6/10/2016 6:44:38 PM
Commenter: Virginia Wolff
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County: I am a retired Family Practitioner living in Skagit County, and a member of Washington Physicians for Social Responsibility. I support the “no action” alternative in the Millennium Bulk Terminals (MBT) Draft Environmental Impact Statement (EIS). Millennium’s proposed coal export terminal would harm communities throughout the Northwest, with the most intense impacts felt in Longview, Washington, near the proposed terminal site. Human and Environmental Health: The Draft EIS reveals many serious impacts to human health and the environment. It dismisses other impacts without a valid basis. The work of Dr. Dan Jaffe on emissions from coal trains in the Columbia Gorge demonstrates that “a diesel-powered open top coal train releases nearly twice as much respirable total particulate matter (PM 2.5) compared to a diesel-powered freight train.” In addition, a significant number of coal trains observed in his study generated visible coal dust plumes, adding to the particulate matter.1 Medical literature documents significant adverse cardiac and respiratory affects of inhaling this particulate matter near the tracks. The human health impacts of noise pollution include sleep loss, which negatively impacts daytime attention and increases accident risk; cardiovascular affects such as increase in blood pressure, heart rate and stress hormones, associated with the risk of cardiovascular disease, stroke and arrhythmias; cognitive impairment in children; and exacerbation of mental health disorders. Noise from trains and whistles would exceed regulatory standards at hundreds of Longview homes, disproportionately impacting people of color and low income communities. Delays to emergency vehicles from the considerable increase in rail traffic by 16 trains/day needs consideration in communities along the entire rail route. In Longview alone consider this: How would 130 minutes per day of extra “down time” at rail crossings affect ambulance transport of a patient suffering heart attack, stroke, or severe trauma? The Final EIS should incorporate the best available science, real world examples, and a comprehensive Health Impact Assessment. The agencies undercut public, tribal, and agency input by failing to complete a Health Impact Assessment before releasing the Draft EIS. 1. http://www.atmos.washington.edu/jaffegroup/modules/news/index.php?storytopic=8

Submission Number: ***MBTL-SEPA-DEIS-0002512***

Received: 6/10/2016 6:57:40 PM
Commenter: Virginia Wolff
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County: I am a retired Family Practitioner living in Skagit County, and a member of Washington Physicians for Social Responsibility. I support the “no action” alternative in the Millennium Bulk Terminals (MBT) Draft Environmental Impact Statement (EIS). Millennium’s proposed coal export terminal would harm communities throughout the Northwest, with the most intense impacts felt in Longview, Washington, near the proposed terminal site. Dear US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County: I am a retired Family Practitioner living in Skagit County, and a member of Washington Physicians for Social Responsibility. I support the “no action” alternative in the Millennium Bulk Terminals (MBT) Draft Environmental Impact Statement (EIS). Millennium’s proposed coal export terminal would harm communities throughout the Northwest, with the most intense impacts felt in Longview, Washington, near the proposed terminal site. Dear US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County: I am a retired Family Practitioner living in Skagit County, and a member of Washington Physicians for Social Responsibility. Climate Change: The agencies are to be commended for conducting an analysis of greenhouse gas emissions that considers the full life-cycle of carbon emitted, from the mine to the point of combustion. As the DEIS acknowledges, the effects of climate change both in Washington and the world are dramatic and coming on faster than predicted: recording-breaking temperatures, wildfires, droughts, water shortages, flooding, severe weather, sea level rise, ocean acidification, political instability in parts of the world, etc. The DEIS states: “Downstream combustion emissions from this coal (44 million metric tons) equals approximately 90 million tons of CO2 (emissions) per year.” It goes on to qualify this number with calculations based on what amount of coal is simply replacing coal which would otherwise come from somewhere else, and other econometric market analyses based on speculation about market response. Further calculations include emissions from transporting the coal from the mine to destination, as well as emissions from combustion alone. One analysis I have read claims that the DEIS shows that estimates of CO2 emissions could increase by as much as 27 million metric tons/year when the proposed facility near Longview is fully operational and the coal is burned in Asia, taking into consideration the impact of exporting this quantity of coal on coal consumption decisions. This is the equivalent of to the impact of over 7 coal-fired power plants. Considering rail and vessel emissions alone, this project would be one of the biggest greenhouse gas emitters in Washington state. Washington State is a national leader in the fight to combat climate change. Coal export undermines the state’s hard work to combat climate change and protect future generations. There are disagreements over how exporting large volumes of coal will affect both price and consumption here and abroad: For example the DEIS assumes that exporting coal would drive up domestic coal prices and reduce consumption. Economists don’t necessarily agree. In spite of these differences, the analysis done by the Washington State Dept. of Ecology and Cowlitz County determined that the impact of these emissions would be “significant and adverse” even with mitigations. Considering the critical global threat of climate change, and the inability to reduce CO2 emission impacts of this project to below the level of significance, the agencies should deny the permits. I urge your agencies to protect public health and natural resources. Reject coal export. Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Millenium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0002513***

Received: 6/10/2016 7:03:46 PM
Commenter: Virginia Wolff
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County: I am a retired Family Practitioner living in Skagit County, and a member of Washington Physicians for Social Responsibility. I support the “no action” alternative in the Millennium Bulk Terminals (MBT) Draft Environmental Impact Statement (EIS). Millennium’s proposed coal export terminal would harm communities throughout the Northwest, with the most intense impacts felt in Longview, Washington, near the proposed terminal site. Rail Traffic: The Draft EIS demonstrates Millennium would have a severe impact on rail and road congestion, along the rail corridor, particularly in Longview itself, and in Spokane County. The DEIS acknowledges that the rail system in Longview simply can’t handle 16 additional coal trains, over a mile long each, per day. Who would pay for the upgrades, and what would the impact of those upgrades be? These impacts would result in increased wait times at grade crossings, increased emergency vehicle delays at rail crossings, increase in train accidents, and unacceptable level of service at multiple rail crossings due to delays from cumulative projects. What do these impacts mean to real people in everyday life? For example, commuters during rush hour, or picking a kid up from school? Because Millennium cannot fix these significant harms, whether in Longview or elsewhere between the mine and the terminal, the agencies should deny permits. Significant amounts of escaped coal dust from piles of coal at coal export terminals and from coal cars en route, are a significant problem at sites of other coal terminals. Local communities bear the cost of necessary clean-up, monitoring coal dust, and putting pressure on companies to hold them accountable. Coal dust coats homes, cars, and boats and contaminates waterways. Coal dust also accumulates on the tracks themselves and can lead to rail instability. Weak & Unenforceable Mitigation: In some instances, the Draft EIS claims mitigation can reduce coal dust, rail traffic, and other project impacts. For example, to mitigate coal dust from the terminal, the Draft EIS proposes a reporting process for coal dust complaints. This borders on offensive. A phone call or email to complain about coal dust fouling a person’s lungs, home, and river is not “mitigation.” Similarly, stating that: “BNSF should conduct a dust monitoring study along BNSF main line in Cowlitz County to evaluate coal dust emissions from coal trains, and if necessary, take further actions to reduce such emissions,” is an unenforceable mitigation measure and targets an entity (BNSF) which is not applying for a permit. The agencies should revise the Draft EIS and remove inadequate, unsupported, and unenforceable mitigation. The Millenium Bulk Terminal project harms our health and safety, air and water quality, and natural resources. I urge your agencies to protect public health and natural resources. Reject coal export. Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Millenium Bulk Terminal. Sincerely, Virginia Wolff MD 8639 Ershig Rd. Bow, WA 98232 Skagit County

Submission Number: ***MBTL-SEPA-DEIS-0000692***

Received: 5/23/2016 12:38:21 PM
Commenter: Jerry and Marie Wolpers
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

As someone who treasures the natural beauty of the American west, I ask that the environmental study for the Longview port proposal be accepted as thorough and sufficient. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). Thank you for listening.

Submission Number: ***MBTL-SEPA-DEIS-0002948***

Received: 6/13/2016 3:27:19 PM
Commenter: Mae Woo
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002049***

Received: 6/6/2016 8:02:08 PM
Commenter: Cynthia Wood
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to not have anymore trains that can impact the quality of life (human, plant, animal)travel through the gorge. At least have the coal cars covered and temporarily sealed so there is no chance of spillage in the event of an accident. All life is precious, and we are smart enough to be able to protect our surroundings, not expose them to preventable dangers. We need to be promoting more echo friendly fuels and get away from our dependency on fossil fuels.

Submission Number: ***MBTL-SEPA-DEIS-0001284***

Received: 5/26/2016 6:38:58 PM
Commenter: Davin Wood
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I'm writing in support of Millennium Bulk Terminals coal export terminal in southwest Washington. I recommend you move forward now that the draft environmental study is complete. It will create jobs and economic benefit for a wide region. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. It is important that the public have the ability to comment on projects of this nature as the affects will last for years to come. Thank you for the opportunity to comment and please see that this project is worthy and should be allowed progress forward and develop. Not only will this create positive change for the site and the people working directly for Millennium, but also for independent contractors in the area who help maintain and upgrade these facilities. Support Local Job Growth! Recognize the value in Industrial Jobs!

Wood, John (0700)

Submission Number: ***MBTL-SEPA-DEIS-0000700***

Received: 5/23/2016 12:46:44 PM
Commenter: John Wood
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support American jobs and the proposed port at Longview will create much needed employment for hundreds of Americans. Please include my comments as part of the public response to Millennium Bulk Terminals plan. Cowlitz County and Washington state need family wage jobs, and this is a good project that will create them. We've studied the project enough, now it is time to move forward with a fair process for permitting. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0003303***

Received: 6/13/2016 8:09:58 PM
Commenter: Karen Wood
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The following comments were provided to me by Audubon Washington. I am concerned about the impacts discussed below. In addition, I am specifically concerned about the impact on elk and deer in the vicinity of Pierce National Wildlife Refuge near North Bonneville, Washington. There will be more mortality in that area due to the increase in rail traffic from the Millennium Project. The findings in the DEIS for the massive proposed Millennium Bulk Terminals in Longview, Washington show that the risks of increased train and coal bunker traffic, train accidents, waterway contamination, air pollution, noise, negative impacts on tribal culture and resources, harm to priority mammal, fish, and bird species, and vehicle delays at railroad crossings cannot be fully mitigated and the environmental and human health harm could be significant. Due to these numerous and enormous risks, we ask that you choose the No-Action Alternative and reject the Millennium Bulk Terminals coal export proposal. The proposed coal export terminal is only 5 miles upstream from Crims Island which supports critical habitat for the federal threatened and state endangered Streaked Horned Lark. Purple Martin nest sites have been documented just 2 miles from the terminal site at Coal Creek Slough one of two nearby Washington State Birding Trail sites. Suitable nesting and foraging habitat for listed species such as the Bald Eagle, Peregrine Falcon, Vaux's Swift, and several waterfowl species including climate-sensitive Barrow's Goldeneye exist well within the reach of anticipated coal dust deposits. In particular, Lord Island supports significant numbers of wintering ducks and geese. The rail and vessel corridors servicing the proposed coal export terminal support habitats of critical importance to a variety of bird species. The Columbia River Estuary represents prime stopover habitat for migratory shorebirds and waterfowl within the Pacific Flyway. The western extent of the estuary is a designated Western Hemisphere Shorebird Reserve Network site,1 supporting large numbers of shorebirds during migration. Some of the largest colonies of Caspian Terns and Double-Crested Cormorants in the world nest and roost on islands within the estuary.2 Avian species lists for the estuary top 300 species, reflecting the diverse habitats available.3 The DEIS states there will be adverse impacts to shoreline vegetation and nearshore fish, specifically forage fish species such as eulachon upon which marine birds and mammals rely. I am also concerned about potential disturbance to birds caused by vessel traffic, including the effects of wake on the birds themselves and impacts to their nesting, roosting and foraging areas. The cumulative impacts of Millennium Bulk Terminals are too great to sufficiently mitigate the risks posed to the birds and wildlife dependent upon the health of the Columbia River ecosystem. Greenhouse gas emissions from the proposed Millennium Bulk Terminals would equal 27 million tons per year, making it one of the biggest GHG emitters in the state and increasing Washington's existing emission pollution by approximately 30 percent. Carbon emissions are one of the driving forces behind climate change threatening 314 North American bird species 189 of which call Washington state home for some part of their life cycle.4 The possibility that this terminal could significantly set back Washington's progressive climate agenda is unacceptable to the people of Washington and the birds and wildlife we are charged to protect. I urge you to choose the No-Action Alternative and reject the Millennium Bulk Terminals coal export proposal. 1 Available at http://www.whsrn.org/site-profile/columbia-river-estuary. Accessed 1.18.2016 2 Available at http://audubonportland.org/issues/habitat/sand-island. Accessed 1.18.2016 3 Available at http://www.estuarypartnership.org/learn/river-species#birds. Accessed 1.18.2016 4 http://climate.audubon.org/

Submission Number: ***MBTL-SEPA-DEIS-0000730***

Received: 5/23/2016 1:30:14 PM
Commenter: Lorena Wood
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate the chance to comment on a proposal like Millennium Bulk Terminals that is crucial to the future success of Washington. I appreciate the time and effort that must go into creating an environmental impact statement. Coal should not be treated differently than other commodities. The opposition will use the precedent set by these studies to justify why every commodity must study global impacts. This is an abuse of SEPA that was never intended to be used to kill the export of a legal commodity. This DEIS is being finely crafted. The progress this port represents should not be hampered. It's time to get folks back to work!

Submission Number: ***MBTL-SEPA-DEIS-0000890***

Received: 5/24/2016 4:52:30 PM
Commenter: Michael Wood
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

There's no time like the present to support the draft study as it relates to the port at Longview. We need the economic boost this port will provide and the world needs American coal. Applying different rules to different people is wrong. Washington State is supposed to be a state that welcomes trade. The ports have grown and expanded to handle more cargo in containers, much of which gets shipped out by rail. There have always been grain terminals in Seattle and Tacoma and recently more have been built along the Columbia River. Boeing still assembles planes in WA, but many of the parts are brought in from around the country and the world by train, truck, and ship. Crude oil has long been shipped into the state by tankers, and now it is being brought in by train as well. Before it approved all of this shipping, government never insisted that any of these businesses study greenhouse gases or rail traffic outside of the state. Government should not change the rules now just because it has decided it doesn't like coal. This draft EIS for a terminal project will affect all other future trade and transportation projects. SEPA should not morph from being project based environmental review to a commodity or product based review. The agencies are doing a great job of evaluating Millennium Bulk Terminals port proposal. I am convinced that this project's permit should move forward without further delay.

Submission Number: ***MBTL-SEPA-DEIS-0001811***

Received: 6/2/2016 5:26:49 PM
Commenter: Richard Wood
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please include my comments as part of the public response to the proposed coal export terminal at Longview. This project should move forward without delay. get off you A## and do something for longview After reviewing the DEIS document, it is my view that it is sufficient and the process should advance in a timely fashion. There are many families in Longview and the surrounding communities, who are ready to go to work at the site. That land has been underutilized for years and it’s time Longview went back to work. Thanks for review and considering my comments. I believe this is important work and will be done fairly by your agency.

Submission Number: ***MBTL-SEPA-DEIS-0002041***

Received: 6/6/2016 4:51:27 PM
Commenter: Sherard Wood
Organization:
State: California

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Coal is a fuel of the past. It is also part of the foundation of our "Garden of Eden"[Earth] that we continue to destroy. To use all that money to build a place to ship out something that should no longer be dug up, when the money could be used, say, for education of the coming generation, is very selfish and not progressive for the human race. Perhaps it is the greedy thought of making more money that comes to the minds of the current generation.

Submission Number: ***TRANS-LV-M2-00010***

Received: 5/24/2016 12:00:00 AM
Commenter: Sharon Woodard
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good afternoon. My name is Dr. Sharon Woodard (phonetic). I'm a physician in Portland, and I have -- I feel really passionate about this whole situation. And I have pages and pages of things to talk about, and I'm just -- I think what I really want to address today is just that the scope of this project and the way that it could affect not just the citizens of Longview, not just the citizens of the Pacific Northwest, not just the citizens of the world but, in fact, our future generations and the generations of the wildlife and the plant life that could be affected. And not just by the dust that's spewing off of these trains as they travel both empty and full circulating throughout our region, but also the effect that once the coal does reach its final destination and is burned and the effect that that's going to have on our climate.

I think that -- coming from Portland, I understand the situation with the jobs situation, but I have to say with the effects that coal and coal burning and particle matter and the particle matter that comes from the diesel fumes from the trains that will be carrying this multitude, it's going to affect the air which affects our lungs, which affects our bloodstream, which affects our nervous system, and affects our children and our children's children.

And I think that the tendrils of this toxic event, it just spreads so thoroughly throughout everything that it's our responsibility to stop this and to figure out a better way.

Yes, we do need jobs, and, yes, we do need to support the citizens of Longview, and we do need to support their children, but not at the expense that this project does. And so I ask you to vote no.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000345***

Received: 5/11/2016 4:12:18 AM
Commenter: Warren Woodge
Organization:
State: New York

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

ANYTHING created to increase the exporting of coal is increasing climate change, which is responsible for so many forests drying up and becoming wildfires. Whether the coal is burned here in the western world, or in Asia, doesn't matter. CO2 is added to the atmosphere which traps more of the sun's energy here in the atmosphere, raising all Earth temperatures by just a few degrees. This extra energy intensifies wind patterns, and while that often leads to extreme storm conditions in many places, it also causes forests in other areas to dry out. Increased storm energy also results in more frequent lightning, which often starts these wildfires that feed on dry forests.

Submission Number: ***MBTL-SEPA-DEIS-0003826***

Received: 6/14/2016 1:20:33 AM
Commenter: John Woodland
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: Attachments
Submission Text
John:

Good evening. I'm John Woodland. I retired in January as the Superior, Montana Fire Chief. I'm speaking from my background in emergency services, I do speak for myself. Superior is one of the many small towns along the rail line that this project will negatively impact. Emergency services and access to many of my district's neighborhoods require crossing the tracks. That's true of many other towns along the rail line. This is what's hauling our water supply across the tracks.

I personally waited at a grate crossing for a train to pass while on an emergency service response. This proposal lacked the train traffic. It increased the likelihood emergency services will be negatively impacted in communities all along the tracks. The tracks in Mineral County in places are built right along steep mountainsides next to the Clark Fork of the Columbia River. Trains fall off these tracks sometimes into the river and not that infrequently.

In my 10 years as the fire chief there have been 2 trains in the river in Mineral County. One visible from my home, included empty oil cars, and the other dumped Boeing fuselages into the Albertan Gorge. More traffic means more wrecks. More traffic will also mean more pressure not to hold up the trains for maintenance work which means yet again more wrecks. For Montana, Eastern Washington and Idaho, it also means less access and higher prices to ship agricultural products. For emergency services, today the 800-pound gorilla in the room is climate change.

If you don't think that's emergency service issue just look at the newspaper for the last week, at the evacuation of between 80 and 90,000 people from Ft. McMurray in May in Northern Alberta, months before there's supposed to be a fire season in that part of the country. This is the future for the entire inter-mountain west if we don't act decisively now with climate change. We cannot continue to invest in fossil fuel projects, such as Longview, and have any chance of limiting the worst impacts of climate change. I urge you to say to no to the Longview Coal Port and yes to acting decisively on climate change now before it's too late.

Steve Running: Yes, I want to particularly point out what I see happening in the global coal markets and global carbon cycle science. That's the stage that I work in, global carbon cycles. We, probably a decade ago, first identified really clearly that the biggest single carbon emission by humanity is burning coal for electric power. It became clear to us right at that point that everything else we do in trying to reduce carbon emissions wasn't going to matter at all if we didn't, first and highest priority, quit burning coal for electric power.

That was over a decade ago. It didn't seem like we were making much progress until about the last year. I can finally say that we've had a pretty good year in global policies. Obviously we all know about the Paris Climate Agreement where every nation signed on to a commitment for driving down carbon emissions, and for most countries that first biggest carbon emission is burning coal for electric power.

What's more immediately relevant to us here is that China not only signed the Paris Agreement, but China actually does a 5-year strategic plan for the nation. What a concept to actually plan the future of your nation. We've got learn something here. In the last 5-year plan, China has publicly announced that they will quit importing coal. What we're clearly seeing is that in 2014 and 2015, China's coal imports went down by actual statistics, so they're making good on this strategic plan that they've announced.

They are starting to drive down their purchasing of imported coal. Of course, their 2 biggest sources are Australia and us. They have already announced that they have a strategic objective to quit buying coal. I can't imagine a worse time for America to be building more coal infrastructure when the biggest customer has already announced publicly that they're going to quit buying. This is really almost a no-brainer.

What I also see now in this last year is that the world financial community has really started to catch on that long-term fossil fuel investment, and particularly long-term coal infrastructure investment, is just plain a bad idea. It's a bad investment. You have very high probability of losing your investment with the trajectory of the global economy and energy. When the world bank and Goldman Sachs, I read almost every week another major financial institution announcing that they are getting out of coal investment ... What we see here is the local version of that same decision point.

You would think this ought to be an easy decision, that the last thing the Pacific Northwest would want to do is invest in long-term infrastructure for coal export when a major customer has already announced that they're going to be capping their imports. I think this is to me, at the global scale that I work at and study and follow, this really should be a pretty easy decision then. This is certainly not a terminal that we want locally, but that even makes any sense in terms of a larger financial picture. It just doesn't make sense one bit. I think that's what I want to leave with you on this topic. Thank you.

Paul Smith: I'm really happy to get a chance to comment on the health implications of the increasing coal shipments by rail for our communities and others. It's easy to make the case that negative health impacts with coal will occur because they've been occurring for the last several hundred years. There's no reason to think a little bit more is better.

I hope to stress the health threats local to Missoula and also stress that this new threat will be greatest on the vulnerable, including children, infants, the unborn, and the elderly. I also have a list of references that I always feel nervous talking and making statements without. If anybody wants the list of the references that at least give the health implications, please see me. Because I take care of children and infants with lung disease, obviously my main concern at the local level is the increase in air pollution from these diesel fumes, coal dust, and worsening climate change.

Data is substantial showing that coal trains do increase bloom concentrations. Diesel emissions are recognized as carcinogens, which was previously noted, and contain toxic substances such as polyaromatic hydrocarbons and particulate matter or PM. Coal dust also adds to air pollution in the form of particulate matter. Of the 6 criteria of air pollutants that the EPA is mandated to regulate, particulate matter is perhaps one of the easiest to track and to correlate with health effects.

It's generated a vast amount of medical literature. We know there is PM increase as public health worsens. We also know that when we lower particulate matter, population health improves. That's an important concept and lends significant credibility to particulate matter being culpable, and justifies action that lowers air pollution. Particulate matter leads to lung damage and diseases such as asthma and COPD. Children are at the highest risk because their lungs are developing and they have more life years of exposure.

This often worsens over decades from accumulating scar tissue along the airways by repeated injury. We have no cure for asthma. For today's living asthmatic children, they may end up being tomorrow's asthmatic cripples. In health, particulate matter also leads to diseases distant from the lungs such as heart disease, stroke, and cancer and even adverse effects on pregnancies and fetal tissue. Infants born to a mother exposed to high concentrations of particulate matter are born smaller, and with impaired lung function.

These more systemic effects outside of the lung happen in part because fine particulate matter can also cross pulmonary system directly into the circulation and they release whatever poisons they contain. Missoula already struggles with air quality in a large part because of our valley inversions that attract pollutants. Despite strong efforts to decrease particulate matter, we often, here in Missoula, are close to the prescribed threshold by the EPA for particulate matter.

There is no safe lower threshold. The more time one spends in high exposure of particulate matter, the greater the effects. Again, this is of special concern to children. Another health concern with coal dust is increased chance of train derailments. You might recall an article in the Missoulian last year quoting the Department of Transportation estimating that there would be over 10 derailments per year in the US of trains carrying nothing but ethanol and oil cargo alone. Missoula is a very populated area. It's time we realize that with only 2 hospitals in our town, we would struggle to handle the type of derailment disaster that hit Quebec killing 47 and devastating a small

town.

Then finally the effects of coal combustion on climate change are already significant here in Montana. As it was noted, we've already come through 2 of the warmest years on records and the warmest April on record. Our snow pack is already lower than normal this year and it's disappearing. Our farmers and ranchers are threatened. Increased forest fires and hot weather will again threaten our health and our children's health.

By way of closing, one of my favorite quotes when giving a talk like this is from CF Elliot in 1909. He was then secretary of Anaconda Copper Mining Company. He stated, "We have the perfect right to carry on a legitimate business and if incidentally we should pollute the atmosphere nobody has the right to complain until specific damage gives them a cause of action." This statement really describes the position that we're in as a company.

We can't stop a process legally until we can show harm. By then, the ground, the air, and the water are contaminated, and our children are sick and it's too late. So ask yourself when we're coming through these discussions what angles are we heading in? Is the public being shouldered with the responsibility to prove harm or is the impetus on the industry to prove there's no harm? Harm to health has already been shown. There is specific cause for us to halt more pollution.

John: Good evening. I'm John Woodland. I retired in January as the Superior, Montana Fire Chief. I'm speaking from my background in emergency services, I do speak for myself. Superior is one of the many small towns along the rail line that this project will negatively impact. Emergency services and access to many of my district's neighborhoods require crossing the tracks. That's true of many other towns along the rail line. This is what's hauling our water supply across the tracks.

I personally waited at a grate crossing for a train to pass while on an emergency service response. This proposal lacked the train traffic. It increased the likelihood emergency services will be negatively impacted in communities all along the tracks. The tracks in Mineral County in places are built right along steep mountainsides next to the Clark Fork of the Columbia River. Trains fall off these tracks sometimes into the river and not that infrequently.

In my 10 years as the fire chief there have been 2 trains in the river in Mineral County. One visible from my home, included empty oil cars, and the other dumped Boeing fuselages into the Albertan Gorge. More traffic means more wrecks. More traffic will also mean more pressure not to hold up the trains for maintenance work which means yet again more wrecks. For Montana, Eastern Washington and Idaho, it also means less access and higher prices to ship agricultural products. For emergency services, today the 800-pound gorilla in the room is climate change.

If you don't think that's emergency service issue just look at the newspaper for the last week, at the evacuation of between 80 and 90,000 people from Ft. McMurray in May in

Northern Alberta, months before there's supposed to be a fire season in that part of the country. This is the future for the entire inter-mountain west if we don't act decisively now with climate change. We cannot continue to invest in fossil fuel projects, such as Longview, and have any chance of limiting the worst impacts of climate change. I urge you to say to no to the Longview Coal Port and yes to acting decisively on climate change now before it's too late.

Michael: My name is Michael Daniel Bolt. I'm a student at the University of Montana. I'm running for House District 98, Montana State District. I think preventing any new coal mining is the best choice. I'm also interested in bringing ideas of increasing government control over the natural resource industry including the coal industry. I believe government run operations of the coal industry would allow us to shut down that industry more responsibly and make any future natural resources extraction use projects really more beneficial to the Montana people. That's the main concession. That's all. Thank you.

Carolyn: Hello, my name is Carolyn Walker. I used to be Carolyn Alderson. I lived along the Tongue River for 20 years of my life. I raised my 3 children there. There is an interesting story about a law and a regulation that actually stopped something. When I lived down there, the Northern Plains Resource Council, I was part of it, was just beginning. That's when you all heard of the Tongue River Railroad. The Tongue River Railroad was thought of and started because there was a mining plan for that area, right on the Tongue River. It was called the Montco Mine.

Well there's a nice picture of me shaking hands with President Carter in 1977 at the signing of the strip mining bill. In that bill there's a piece of the legislation that says, "There shall be no strip mining on Alluvial Valley Floors." The Montco Mine was right on the Tongue River. It caused some difficulty in the community. I just wanted you to know that there are ways to use legislation and rules to stop bad things from happening. My recommendation is that we recommend no action on the Longview Port.

Jim: My name is Jim Parker. I live in Missoula Montana. As a Montanan along the rail corridor between the Powder River Basin mines and the proposed terminal I oppose the Millennium Bulk Terminals because of the associated increase in coal train traffic through my community. The increased coal train traffic will bring with it increased air pollution and health risks from increased coal dust and diesel exhaust and increased noise pollution.

In addition, the increase in coal traffic through my community will reduce access across the tracks and cause traffic delays for citizens, commuters, for emergency response vehicles when there's a medical emergency or fire, or a need for police. The additional train traffic will also provide greater potential for vehicle collisions with trains and for pedestrian accidents.

As a Missoulian and Montanan, I'm asking that the EIS fully analyze and consider the impacts of this port and the increased coal train traffic would cause here in Missoula and across Montana especially as it relates to the above sited impacts. The proposed project’s impacts are real and significant to Montanans and are connected in cumulative

result of what happens if this project is approved.

The EIS prepared by the court in the Washington Department of Ecology in Cowlitz County must include all the connected and cumulative impacts in Montana that will result if the MBTL facilities are approved and constructed. These include the significant connected and cumulative impacts on the project all the way back through Montana to the Power River Basin Coal Mines in Montana and Wyoming.

The increased rail traffic in Montana must be addressed, analyzed, and its consequences fully considered in the EIS. More trains in Montana will mean an increase in the amount of airborne pollutants, from diesel engines as well as from coal dust. Medical studies have shown a clear link between both diesel air pollutants and coal dust and disease.

While those with chronic disease, the elderly, young children, and pregnant women are most at risk, the health effects from particulate matter exposure may occur years later. Even healthy individuals need to be concerned. These issues must be addressed, analyzed, and their consequences fully considered in the EIS. The MBTL facility will directly lead to an increase in the burning of coal. The link between increased coal burning and associated public health problems cannot be ignored and should be included, analyzed, and the consequences fully considered in the EIS.

Finally, because the sole purpose of the MBTL facility is to facilitate the shipping of coal being transported from the PRB to its final destination in Asia, where it will be burned for energy, I also believe that the EIS must fully consider the long term and direct effects that this action will have on the global climate.

In conclusion, I strongly oppose the proposed Millennium Bulk Terminals Longview facility. The connected and cumulative impacts to Missoula, and all of Montana, from the proposed facility, are real and significant. The EIS prepared by the co-lead ggencies for this project must address, analyze, and consider all the connected and cumulative impacts this proposal will have on Montana. Please reject this proposal and take no action.

Thank you.

Harold: I'm Harold Hoem from Missoula. The whole town of Butte Montana went through a long period of horrible air quality early in this century because of ore smelting. Read a book called Smoke Wars. People sickened and then died especially underground miners like my grandfather who was cut down in the prime of life by lung disease. The corporate giants called the air pollution a nuisance. It was deadly. Oh, what a nuisance Biff was to my family.

What are some corporations proposing to do this century later but ship Montana coal overseas so citizens there can get sick and die from nuisance called coal? A friend of mine who was a former coal mine manager says this, "The problem with the coal mining industry is the product is a poison”. We know that CO2 is increasing dramatically. It is now over 400 parts per million. Humanity hasn't seen this stuff but it is affecting climate

change dramatically.

The current wildfire in Ft. McMurray in Alberta Canada caused the evacuation of over 88,000 people. The smoke from each building is hundreds of miles away. Perhaps a wake-up call for Montana. We have rapidly declining snow pack and are facing longer and harder, tired, and more dangerous fire seasons and possibly worse than Iroquois. For sure a nuisance for residents and a real downer for tourism. The DEIS gives Montana a scant potential.

They say 16 additional coal trains a day would go through Missoula that cite inflated numbers for existing traffic of 25 to 28 trains. We currently see only 13 to 15 trains. 16 more trains would double current traffic. The effects would ripple down all the impacts of safety risks, derailments, noise, dust, the laser crossings et cetera. They should know where our current capacity is and give assurances that deficiencies will be mitigated. My last word , bring down CO2 emissions by switching to renewables. Vote no action. Show the US means business in climate litigation.

Gary: I'd first like to thank Northern Plains and the Hoems in particular for it, and Les Anderson coming all the way from Longview to speak here. The speakers, it's been a very nice haven. Thanks for this opportunity to comment. Hi there, I'm Gary Mattson. I live in West Riverside, which is a suburb of Milltown. I really seriously, if the most serious effects of this port certainly have to do with health and climate change.

For those reasons, I am just baffled that so many people either ignore the science, or deny the science, or simply don't know about the science. I cannot understand why we have so many people that are not supportive of recognizing climate change demand. Some of the effects aren't realized. I can see in my community. Milltown has one singal entrance to it across on the south side of Powder River, there is one railroad crossing.

If that railroad crossing was blocked, no emergency services can occur. Our fire chief manager will recognize that concern. In Missoula County that's 10. That has a significant impact. The additional of 16 trains would really be a big impact on emergency services. For multiple reasons, I would strongly recommend that no action alternative.

George: Thank you, thank you all for being here. My name is George Price. I was asked to represent an organization I belong to named Indian People's Action. Indian People's Action asked me to be here as an environmental issues coordinator.

I would like to put our input collectively in here; just the fact the basis what coal is doing to our climate and the life on earth. I think that should be enough reason to keep it in the ground, not transport it anywhere. Anybody who's paying attention and looking at how fast this is escalating climate change to an unpredictable level at levels with all the other elements that are being released. Rising sea levels, you can go down the whole list if anybody's honest about that, you would say yes, let's stop all of this.

I'd also like to say let's look at the paradigm shift and deeply question a society that creates incentives for people to write environmental impact statements that are

intentionally lying to the people for profit, for money in a society that lives for money. I'm not going to go into my whole historian's diatribe there. I had often wondered what if the people who came from across the ocean, and likeminded people that welcomed innovation in Massachusetts had come to learn instead of to control. It's great. Can we start on the right foot now? I recommend the no action on behalf of Indian People's Action of Montana.

Dave: Hi, my name is Dave Dittloff. I'm the regional representative for National Wildlife Federation. Most of you are probably aware of National Wildlife Group. We're the folks who put on Ranger Rick Magazine. That's our biggest identifier here with the kids.

In 3, 4 years that that's going to take, yet there's nothing coming back up the streams in order to spawn salmon. The impacts are almost certainly down to relating to some of the impacts here. Last year, last summer's conditions literally had most of the species dying, most of the adults coming back to the rivers and streams here to the headwaters of the Columbia River Basin died due to high temperatures, directly related to climate change.

I want to talk a little about, quickly here's something that hasn't been hit hard today, talk about wildlife. It starts right from the beginning. You look at the mine site here, the direct habitat displacement, the coal recommendation that follows it, that impacts wildlife. If you look at what happens on the mine sites with water, that impacts fish and wildlife. The next connector we look at has it transferred over? We look at the trains. There's been a lot of talk about human health and consequences here which are really important. Those same impacts are related to wildlife for particularly the fisheries here. That coal dust gets in the streams. There's mercury concern with it here and other neurological issues are a concern.

Mercury is bad for people eating the fish as well. We've got dozens of streams and multiple dozens of lakes in Montana that had mercury consumption warnings here. You can only eat so much of the fish. That's an impact to wildlife. You look at the ports, same thing here. The direct construction of the ports, this place is habitat for sure. That has real consequences to the fisheries. You'll see salmon come in and out of the ocean as well here.

Lastly, climate change, I got to talk to you about salmon. Name a critter, even the biggest critters, white tail deer, elk, etc. that think generalist that those are for generalist. There's impacts here. More and more research that's done it's really impact of Montana's out pour heritage, it's culture, what we like to do here whether it's sightseeing, hunting, fishing, what have you here. Fishing is a multi-billion dollar industry in Montana and the Pacific Northwest. There's economic reasons associated with wildlife as well here. I appreciate it. No action alternative makes sense for wildlife.

Dave Jones: Hello, my name is David Jones. I've been a fly fishing guide in Montana for over 30 years. Dave just inspired me to get up here and talk about what I see in my career fishery that I work primarily in. My season has been shortened by an average of about 6 weeks in the 30 years I've been doing this. We don't have clients in August anymore at all because of

the low flows. Half the time our rivers are shut down because we have to worry about railing over there. Anybody that watches the forester around in the spruce moss and the beetle kill, it's just obvious that Montana is being really affected. We mentioned the economic impact, but really we're talking genocidal, ecocidal impacts for climate change. We ought to think in those terms really. This is an emergency. I recommend no action on the terminal. Thank you.

Steve: Hi, my name is Steve Schwartz. I live here in Missoula. I'm a professor interior of the Department of Communication Studies at the University of Montana. I teach and do research in environmental communication. No matter what the coal industry says about the free market, their goal is to get government on their side to make the market work for them whether it's supporting carbon cash receipt frustration, whether it's blocking the clean power plan, or supporting coal export infrastructure like MBT as a goal. It's past time for us to use our voice to remind government agencies who's side they need to be on and who's interest they need to represent.

The connected and key note we've heard about tonight on public health and safety, on air, land, and water, on wildlife, and on climate change are common in house. They're shared by the residents of the Pacific Northwest, shared in common by the people who live in Washington and Idaho and here in Montana. We all deserve a voice in this decision. For that reason, I want to thank all the organizations that have made this opportunity possible for so many of us to express our voices. To protect the commentators in the Department of Ecology, to take no action, thank you.

Jim: My name is Jim Roach. I've been a Missoula resident for 45 years. I don't understand why it's draft Environmental Impact Statement doesn't address impacts for rail traffic in Montana. That seems sort of ridiculous. It seems like a rip off. On behalf of my family, and my friends, and a lot of people that I know are neighbors, I just want to say we don't want any more coal dust. We don't want any more diesel fumes. We don't want any more threat of derailment. We don't want traffic complications from increased rail traffic. We don't want the noise.

Most of all we don't want the climate impact. We don't want the endless smoky summers. We don't want the low stream flows and the sick fish. We don't want the reduced fishing opportunities. We don't want increased beetle kill. We don't want disappearing biodiversity. We don't want damage to agriculture. We don't want the drought. We don't want climate refugees. We don't want shut downs of skiing areas. We don't want this action, no action. Thank you.

Claudia: My name is Claudia Narcisco. I am speaking for myself today. When I was trying to find some things that I was going to speak about, I found an old letter that I had written in I guess November 2013. There goes my letter. I had it on my phone and mailed it to myself. Anyway, it was hard enough to read. I emphasized that connection actions between the mine and the port and Asia and the impacts on climate change and how it would cycle back to us.

I requested that they consider this. I cited a section of the National Environmental Policy

Act. I believe it was section F2 or 2F that specifically directed agencies to consider international ramifications of actions which is not something that we normally associate with, but it's just that it was our responsibility to do that. Obviously those things were not necessarily done, as far as I could tell, to this point.

I hope that's considered.

Submission Number: ***TRANS-SPOKANE-M2-00012***

Received: 5/26/2016 12:00:00 AM
Commenter: John Woodland
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening. I'm John Woodland. I retired in January as the Superior, Montana Fire Chief. Superior is one of many small towns along the rail lines this project will negatively impact.

Emergency service access to many mine districts and residential neighborhoods requires crossing the tracks. This includes hauling our water supply across the tracks.

I have personally waited at a grade crossing for a train to pass while on an emergency call. This proposal will add to train traffic and increase the likelihood emergency services will be negatively impacted in communities all along the tracks.

The tracks through part of Mineral County have places built along steep mountainsides next to the Columbia River. Trains falling off these tracks sometimes into the river are not uncommon. In my ten years as fire chief there have been two trains in the river in Mineral County. One visible from my home included empty oil cars and the other dumped Boeing fuselages into a recreation area.

More traffic means more wrecks and more pressure not to hold up trains for maintenance work. For Montana, Eastern Washington, and Idaho it also means less access and higher process to ship agricultural products.

For emergency services, however, the 800-pound gorilla in the room is climate change. And if you don't think that's an emergency service issue, think about the evacuation of 88,000 people from Fort McMurray in early May. This quite honestly is a future for the entire intermountain west unless we act decisively now.

We can't continue capital investments and fossil fuel such as Longview proposal and have any chance of limiting the Washington impacts of climate change.

Everybody wants secure jobs. But you don't get secure jobs by investing in 19th Century technology associated with a dying industry. You get secure jobs by investing in 21st Century technology to replace it, and I would ask that you say no to this proposal.

EVENT HOST: Thank you. Our next speaker?

Submission Number: ***MBTL-SEPA-DEIS-0003343***

Received: 6/13/2016 9:19:57 PM
Commenter: Jan Woodruff
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
No new Carbon Bombs or BombTrains, or "oopsies. Let's embrace the transition to renewables and the Clean Economy.

Submission Number: ***MBTL-SEPA-DEIS-0001560***

Received: 5/31/2016 5:09:42 PM
Commenter: John Woods
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The draft environmental study for Millennium Bulk Terminals coal export facility was sufficient. Please move forward. There are many benefits of the project that the community is waiting for. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. In today's economic climate, the importance of adding a significant amount of family wage jobs should not be taken lightly. Millennium's proposal is showing a commitment to being environmentally responsible, making safety a priority, and helping fuel our economy which is what we need. Please take these things in consideration while deciding the scope of this project. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0003099***

Received: 6/13/2016 5:30:55 PM
Commenter: Krista Woodward
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The trade industry is one of the bright spots in an otherwise bleak economy. Please approve the coal export terminal at Cowlitz County and speed up the permitting process to help get our economy moving again. Railroads have always been a part of our community. While rail traffic can create some inconvenience as we wait for a train to pass, the railroad means we can get goods to market. This is essential to support the jobs and taxes that sustain our community. Rail traffic increases and decreases over time. The Draft EIS did not need to consider rail traffic in states beyond WA, but now that its done, I support the final EIS and progress for this project. Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done! Sincerely, Krista Woodward Kriswoo74@gmail.com 99301

Submission Number: ***MBTL-SEPA-DEIS-0000538***

Received: 5/19/2016 5:42:11 PM
Commenter: Teresa Woolery
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Millennium Bulk Terminals will bring jobs and stability to Cowlitz County. Export projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen. This review process is unprecedented. To single out a particular commodity does not make economic sense. Agriculture goods as well as many other exported commodities use rail traffic, truck traffic, and marine cargo to get their items to markets around the world. This draft EIS for Millennium's proposal is unprecedented and has far reaching economic implications. Thank you for taking my comment and for providing the opportunity to weigh in. I believe strongly in this project and hope that you will consider the strong commitment Millennium has made to restoring and protecting the environment in our community.

Wooley, Kathy (3728)

MILLENNIUM **Bulk Terminals - Longview**
SEPA EIS State Environmental Policy Act Environmental Impact Statement

COMMENT FORM

Cowlitz County and the Washington Department of Ecology request your comments on the State Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview.

Written comments can be submitted a number of ways:

- Submit this completed comment form at one of the public hearings/open houses
- Mail this completed comment form: Millennium Bulk Terminals EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Complete and submit an online comment form: www.millenniumbulkeiswa.gov

Comments on the SEPA Draft EIS are due by **June 13, 2016.**

Does your comment relate to one or more of the following areas?

- ☐ Noise
- ☐ Air Quality
- ☐ Human Health
- ☐ Rail Transportation
- ☐ Vessel Transportation
- ☐ Vehicle Transportation
- ☐ Coal Dust
- ☐ Greenhouse Gas
- ☐ Climate Change
- ☐ Plants and Animals
- ☐ Marine Species, Fish, or Fisheries
- ☐ Wetlands or Streams
- ☐ Water Quality
- ☐ EIS Regulatory Process
- ☑ Other topic

PLEASE SHARE YOUR COMMENTS BELOW:

I grew up in Longview and am aware of their economic depression. I believe the port expansion is a great idea — BUT NOT FOR COAL/OIL trains!! I also live in Spokane, am against coal trains for a miriad of reasons! What is Washington State government doing to help out Longview and Southwest Washington's economy?? Can we expand the port but not for coal/oil trains???

(additional space is provided on the back)

(comment continued) Is anyone looking into this?

Kathy Wooley

Submission Number: ***MBTL-SEPA-DEIS-0003164***

Received: 6/13/2016 6:13:59 PM
Commenter: Samantha Wooten
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter

Submission Number: ***MBTL-SEPA-DEIS-0002215***

Received: 6/7/2016 7:29:15 PM
Commenter: John Worster
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Southwest WA is suffering economically. I wish to voice my support for the proposed port at Millennium because I would like to see more projects like this be successful so that our economy can benefit. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. Millennium Bulk Terminals in Longview is offering to create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.

Submission Number: ***MBTL-SEPA-DEIS-0001684***

Received: 5/31/2016 6:43:26 PM
Commenter: Wayne Worthen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to reach out on this important issue. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. This proposal will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental standards are maintained. This is what Cowlitz County needs in our present economy. Please move the permitting process along as soon as possible.

Woten, Tammy (0974)

Submission Number: ***MBTL-SEPA-DEIS-0000974***

Received: 5/24/2016 5:43:25 PM
Commenter: Tammy Woten
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I'm glad to have the chance to make a comment about this project as it's very important to me. Washington can have BOTH economic growth and a healthy environment. Millennium contributes to both. It will create hundreds of family-wage jobs and has already commenced the clean up of the Reynolds Aluminum site. It will make it cheaper and faster for Washington exporters to get their goods to market and will comply with all existing environmental regulations. The company will contribute to reducing Cowlitz 8% unemployment and will use the cleanest covered loading and unloading conveyors available. And it will contribute to Longview's quality of life at the same time as ensuring that approaching coal cars have surfactants effectively reducing coal dust to non- significant levels. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0000190***

Received: 5/10/2016 3:49:00 PM
Commenter: Dave Wray
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
Please stop this one like we did the one to Bellingham.

Submission Number: ***MBTL-SEPA-DEIS-0002696***

Received: 6/13/2016 1:17:24 PM
Commenter: Ashley Wright
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0002738***

Received: 6/13/2016 1:57:40 PM
Commenter: Brenda Wright
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0000151***

Received: 5/9/2016 1:24:26 PM
Commenter: David Wright
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I appreciate being able to comment on the Longview port proposal and wish to add my support to those who wish to see this terminal open and operating as soon as possible. This is an important addition to the local and US economy. I appreciate the opportunity to add my thoughts to the public comment period. The agencies should proceed to the next phase as quickly as possible.

Submission Number: ***MBTL-SEPA-DEIS-0001024***

Received: 5/24/2016 6:13:37 PM
Commenter: Gary Wright
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). Thank you for reviewing my comments today.

Submission Number: ***MBTL-SEPA-DEIS-0001388***

Received: 5/26/2016 7:33:24 PM
Commenter: JJ Wright
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Your website says it all. Boeing, PACCAR, Microsoft and Starbucks? BAAAAAD examples of export pride [20% of WA trade will continue with or without these unethical companies] but Coal is worse---especially from the Powder River Basin. The documents you list discuss climate change, CO2 emissions, 'sealant' for coal dust on train shipment, storage technology, poverty in other countries where they "need coal" (claiming Bill Gates as an informed export is laughable, but only oligarchs and their sycophants can accept this bizzarro-argument By the by, we have no responsibility to "help the poor in other countries" when a) we need to focus on our own [not by dirty energy jobs] and b) we would simply be dumping our hell on them. Let's instead support other nations by monitoring human rights/stopping exploitation, corruption and slavery, and assisting, by INVITATION, in grassroots projects [like water pumps, solar panels and microloans] on the ground. There are plenty of them. It's too obvious it's not charity you care about. Jay Inslee has generally been against this dirty energy menace. The EIS does not include train accidents, coal dust in communities, destruction of the land and community where it is sourced and where it will be consumed. Trekking and shipping the dirtiest filth across the world would bring shame to Washington Also, your website states WA has strict environmental standards. No it doesn't. The Department of Energy is infamous for the Hanford debacle. The other claims are inconsequential and, well, pathetic, for a energy extracting giant who has been pushing this project for over four years.

Submission Number: ***MBTL-SEPA-DEIS-0003158***

Received: 6/13/2016 6:09:36 PM
Commenter: Nick Wright
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter

Submission Number: ***MBTL-SEPA-DEIS-0002707***

Received: 6/13/2016 1:26:51 PM
Commenter: Quentin Wright
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter.

Submission Number: ***MBTL-SEPA-DEIS-0003130***

Received: 6/13/2016 5:52:13 PM
Commenter: Roger Wright
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I am writing to voice my support for the proposed Millennium Bulk export facility in Longview that is currently undergoing environmental review. First of all, I want to commend the state and county for conducting such a thoughtful and in-depth environmental review. Shepherding this review through such a process is an essential tool and I am satisfied that at this point the project has been appropriately reviewed. The thorough review also helps me feel confident that the project will meet Washington's already high environmental standards. However, while the importance of protecting the environment cannot be overlooked, we also must keep in mind another tremendous factor in this decision, our economy and the livelihoods of our citizens. As you know, nearly forty percent of all Washington jobs are tied to trade related activity. And with our state's economy tied so closely to trade it is worth noting that nearly 90% of Washington's exports come from small to medium size business with less than 500 employees. With growing demand for U.S. domestic goods in the global market, the Millennium Bulk Terminal project represents an infrastructure opportunity in which Washington businesses and workers across the state will significantly benefit. In fact, the Millennium terminal will positively impact Washington for years to come. Almost immediately the project will create as many as 2,650 direct and indirect jobs during construction, with a total of 300 full time direct and indirect jobs generated once complete. Additionally, the tax revenues from the project both during construction and then ongoing during its operations will support projects and services for the state's citizens. But with trade growth expected to grow across the state and certainly along the Columbia River, securing new privately funded investments today will ensure long-term improvements to our trade related infrastructure, which is essential to the well-being of jobs in Washington and throughout the Pacific Northwest. Furthermore, with neighboring domestic and international ports continuing to expand, export and trade has reached new levels of competition. Maintaining our position as a leader in the global market is no longer just a concern for Washington's economy and job growth, but an interest for all of the U.S. The competitive threat from our neighbors in Canada and even those down in California should not be ignored. In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy, and provide our state with a world class project that will ensure environmental standards are maintained. Higher standard of living and long-term security for the families of Washington are sure to accompany this project. I applaud the Department of Ecology and Cowlitz County for the thoughtful and procedurally important review of the project and I urge the both agencies to continue on to advance this tremendous trade investment in a fair and timely manner. Thank you for your consideration and the opportunity to comment on this important matter

Submission Number: ***MBTL-SEPA-DEIS-0000189***

Received: 5/10/2016 3:47:44 PM
Commenter: Stephen Wright
Organization: 4theplanet
State: Nevada

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Please don't help coal companies export there dirty fuel to other countries. We see the end of coal in America is very close, so let's tell other countries across the world that we don't support the burning of coal anywhere by denying them access to an export terminal. Think of the future. A future with only clean energy!!! Thanks, steve wright

Submission Number: ***MBTL-SEPA-DEIS-0000774***

Received: 5/23/2016 2:14:21 PM
Commenter: Thomas Wright
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I write today in support of Millennium Bulk Terminals coal export terminal. This is a project that is easy to support because it will benefit families both within and outside of its southwest Washington location. The project presents a path to employment for many, let's makes it happen. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. I greatly appreciate you considering my input.

Submission Number: ***MBTL-SEPA-DEIS-0002168***

Received: 6/7/2016 6:51:56 PM
Commenter: Willis Wright
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Here are my comments on the Millennium coal export terminal. I support the project and the jobs and tax revenues it will provide. This draft EIS is exhaustive and quite frankly, overreaching. For instance, because the proposal is a terminal proposal, the use of the bulk commodity by a third party is a superseding and intervening cause to the combustion of coal. As a result of these superseding causes, the construction and operation of the terminal is not a proximate cause of the combustion of coal. Enough already! Millennium Bulk Terminals in Longview is offering to create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.

Wulf, Laura (2298)

Submission Number: ***MBTL-SEPA-DEIS-0002298***

Received: 6/9/2016 4:59:20 PM
Commenter: Laura Wulf
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

It is with great concern for the environment that I write to ask your support of the Millennium Bulk Terminals proposed Longview coal export project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how ports should be developed and I would like to see it move forward without delay. This draft EIS is exhaustive; there is nothing further to study. Coal is an abundant commodity that moves freely in a global market. Asian economies consumed over 5 billion tons of coal in 2012 without any exports through Washington ports. Additional supplies to feed that market are coming on line from Australia, Indonesia, South America and Mongolia, and domestic supplies in China are becoming more readily available. Assuming that incrementally new GHG releases will result from some portion, or all, of future coal exports from a new terminal in Longview Washington that, at maximum capacity, would amount to less than 1% of Asian coal use, requires a degree of speculation that is not permissible under SEPA or NEPA. I sincerely appreciate the opportunity to submit these comments on the Draft EIS. Let's get this project moving forward so there are more good-paying jobs in the U.S.A.

Submission Number: ***MBTL-SEPA-DEIS-0002318***

Received: 6/9/2016 5:14:44 PM
Commenter: Barry Wunker
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The proposed coal export terminal at Longview should be approved. Millennium Bulk Terminals has a clear and environmentally-sound plan that will be studied to make this port a reality and it will do much to contribute to the economy and vitality of the region and the country. Regulators have been looking at this project for years, and it's time to move it forward. Millennium has committed to meeting the environmental requirements of our local, state and federal governments, it's time to let it. I'll look forward to updates.

Wyatt, Sean (3224)

Submission Number: ***MBTL-SEPA-DEIS-0003224***

Received: 6/13/2016 6:59:15 PM
Commenter: Sean Wyatt
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

support American jobs in the trade industry and ask that Millennium Bulk Terminals be moved forward in a timely manner. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. Thanks again to the agencies for allowing public comment on this important proposal. It should continue to go forward with much enthusiasm. Sincerely, Sean Wyatt swyatt@wesco.com 82718

Submission Number: ***MBTL-SEPA-DEIS-0001373***

Received: 5/26/2016 7:25:01 PM
Commenter: Jeff Wygant
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. Millennium is cleaning up the former Reynolds Aluminum site and protecting the Columbia River ecosystem at no taxpayer expense. It has made a major environmental contribution to Longview and the state of Washington because it knows it's the right thing to do. It has spared no expense with covered loading and unloading facilities at the terminal. And the coal train loads arriving at the terminal will all be covered with surfactants that effectively reduce coal dust, eliminating any serious concerns. The agencies are doing a great job of evaluating Millennium Bulk Terminals port proposal. I am convinced that this project's permit should move forward without further delay.

Submission Number: ***MBTL-SEPA-DEIS-0001281***

Received: 5/26/2016 6:37:31 PM
Commenter: Casey Wylie
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Please move forward with the government’s environmental study. I say let's get moving with the Longview port ASAP. Too often, projects that promise historic economic opportunity like Millennium Bulk Terminal get lost in cumbersome procedures and bureaucratic delays. This is unacceptable. Our communities need to foster economic growth when it comes knocking on our door. This project has the ability to deliver this, and has earned a fair and detailed draft EIS after five long years

Submission Number: ***TRANS-LV-M1-00054***

Received: 5/24/2016 12:00:00 AM
Commenter: Diane Wynne
Organization:
State: Oregon

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Good afternoon. I'm Diane Wynne from Portland. As a public health nurse who's spent over 35 years conducting accident prevention research, I'm concerned about several health and safety issues with the proposed project. One area that hasn't been adequately addressed in the DEIS is the issue of fires and how these may cause burn injuries and respiratory problems for individuals in and near the terminal as well as people living in communities along the railroad. As I'm sure you know, the project will be dealing with the hazardous type of coal which is soft and easily breaks down. Powder River Basin coal is notorious for the hazards it presents regarding fires and explosions. This was a conclusion by NIOSH following an investigation into the deaths of two firefighters killed when trying to put out a fire of PRB coal. PRB coal is twice as likely to self-combust than other types of coal. It will not only smolder and catch fire along storage piles and power plants and coal terminals, but it's been known to be delivered to a power plant with a railcar or barge partially on fire. PRB coal dust is also a fire hazard. Sparks and friction from machinery have caused major coal dust fires and explosions. The potential for fires along the entire rail route is also a concern. BNSF has stated that coal dust has caused fires in areas where coal dust has accumulated. A fire department in Wyoming has found that coal fires along train tracks account for at least 50 percent of the department's summer call volume. Operators familiar with the unique requirement of running PRB coal will tell you that it's not a case of if you will have a coal fire, it's when. Is this a risk worth taking? I think not. The potential negative impacts of the project of human health and safety are too great. I recommend that you deny the project and select the no action alternative. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002089***

Received: 6/7/2016 4:52:50 PM
Commenter: Stven Yates
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Coal is safely used and transported all over this planet. This export terminal should not be viewed or studied as if it is a major departure from work that has been happening for centuries. Stopping the coal terminal will not stop Asia from importing coal, but it will stop them from using high quality coal mined in the United States. Other suppliers on the market will fill this demand with coal that has increased mercury, sulfur and nitrogen oxides. During the permitting process, officials should remember the fact that not one ton more of coal will be used globally because of this project, and the net gain in greenhouse gas emissions is insignificant. Keep this process moving. We need a fair environmental review for this project no different than any other import/export facility.

Submission Number: ***MBTL-SEPA-DEIS-0001959***

Received: 6/6/2016 2:09:05 PM
Commenter: Dennis Yeary
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing today to express my support for the Millennium Bulk Terminals project in Longview. I am glad for the opportunity to voice my support of this important project. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. Thank you for your work to move forward with this project.

Submission Number: ***TRANS-PASCO-Q2-00008***

Received: 6/2/2016 12:00:00 AM
Commenter: MaryLou Yocum
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
My name is Mary Lou Yocum.

When I was born in 1945, CO2, PPM, that's carbon dioxide in the atmosphere was estimated at 310 to 320 parts per million. Parts per million means every one part of CO2, there are one million other gases that make up the atmosphere. Ten years ago it was 384 parts per million, last year it was 403.7 parts per million. May 22, 2016, it was 408 parts per million. This does not seem like a lot except in real terms it is a 24 percent increase since parts per million began being collected, the data in 1960. The data suggests that the annual increase is more than two parts per million per year.

Most climate scientists believe that this generation in our world will never see anything below 400 hundred parts per million. 400 parts per million is symbolic, and it doesn't really signal anything but the last time these numbers were this high, humans did not exist. So what is the big deal? These increases are causing real significant climate change.

Warmer weather, wetter weather. When I was young, rain was generally described in terms of inches. Now it is not uncommon to describe rainfall in terms of feet. Uncontrollable wildfires may become the norm. Drought will cause population migration. Heat waves already kill many people every year. So what does this have to do with coal?

Coal is a fossil fuel that when burned creates CO2. It does not matter where it's burned. So, just because it's not burned in the US does not mean that we are not responsible for putting CO2 in the atmosphere.

Coal needs to stay in the ground. Selling coal for profit or because there is a market in another company is not justification for damage that will occur when the coal is burned. We can no longer burn coal, period. We are not just talking about today or next year. CO2 stays in the atmosphere for multiple generations. We have to decide today we will not do this because of our children and the future generations. Thank you.

Yost, Connie (0635)

Submission Number: ***MBTL-SEPA-DEIS-0000635***

Received: 5/20/2016 1:18:20 PM
Commenter: Connie Yost
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing about the Millennium coal export project. I believe this project is good for the community. Millennium has helped clean up the old Reynolds facility and the Columbia River. The old industrial site had degraded water quality and fish habitats on the river. Millennium has completely turned this around. Millennium has demonstrated a commitment to do everything in its power to contribute to the well-being of the community and local environment. If you ask people in Longview what they think of Millennium, they will tell you they are a good neighbor, good employer and responsible steward of our environment. We need to move this project along. Thank you for your consideration.

Submission Number: ***TRANS-SPOKANE-M2-00064***

Received: 5/26/2016 12:00:00 AM
Commenter: Helen Yost
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Good evening, and thank you for your work on the study. I'm Helen Yost, Y-O-S-T. In Idaho I'm from Sandpoint and Moscow, a former University of Idaho Natural Resources Ph.D. student and climate activist since 2010, representing over 3,000 comrades of wild Idaho rising tide.

I'm here to ask you to prepare a probiotic EIS that considers all the environmental and social impacts of the proposed Millennium Bulk Terminal's coal export terminal on all U.S. citizens and environments along rail lines from the Powder River Basin coal mines to the proposed port in Longview.

Where in your Draft EIS do you analyze the risks and effects of toxic coal dust and carcinogenic diesel fumes on residents in Sandpoint and North Idaho where our office is located within only a few blocks of the BNSF rail line?

Where does your 3300-page study, the well-documented accumulation of coal chunks and diesel soot in water's habitats and species of America's fifth deepest lake, Lake Ponderay? Where does it weigh the damage to rails and bridges from coal trains and the clogging of that ballast that causes rails to shift in saturated weather. This being Idaho derailments are even more hazardous freight.

Please issue a supplemental, programmatic Draft EIS like the one initiated for the once largest coal export terminal in North America, Gateway Pacific, with Millennium now claiming that distinction and hundreds of thousands of Idahoans already enduring potential adverse health environmental economic impacts of Millennium's eight additional full and eight empty trains daily through our panhandle, we deserve your fair and equal treatment under Constitutional law, and under our shared climate of which we each breathe 35 pounds every day.

We promise estimating direct action with our allies throughout the region if this terminal does go forward.

Submission Number: ***MBTL-SEPA-DEIS-0000629***

Received: 5/20/2016 1:11:43 PM
Commenter: Heather Young
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My comments pertain to the draft EIS for the Longview coal export facility. I hope you will give them good consideration. This draft EIS is sufficient and it is time to move forward. We (Americans) take readily available power for granted, and unlike the rest of the US that relies on coal for electrical power, in the northwest we take hydropower for granted. The majority of countries in the world do not have continuous and reliable power, and if they do it is usually coal power. A sense of balance should be made when looking at the environmental impacts verses the worldwide health, social and economic benefits of coal based power. Thank you for your consideration. I look forward to seeing this project come to reality.

May 24, 2016

My letter of concern addresses the Washington Dept. of Ecology re; the proposed Millennium Bulk Terminal in Longview, Wash. I live with my family in Sandpoint, Idaho where we are currently blessed with both clean air and clean lake water. If this misguided and unnecessary project is permitted, I fear for my family's health due to the proposed 8 full open-air trains per day with 500 pounds of coal dust threatening increased childhood bronchitis, asthma, pneumonia, emphysema and heart disease. The increased rail traffic of 16 extra trains per day would pollute with diesal exhaust, and clog traffic, slow response times for emergency responders and delay and limit access to neighborhoods, schools and business corridors.

Please consider the extreme decrease to the quality of life and health here as well as danger such an ill-thought plan would pose for us.

I implore you to not permit such a potentially dangerous terminal!

Sincerely,

Mary Jane Young
Mary Jane Young
1210 Larch St.
Sandpoint, ID 83864
(208) 263-1672

Submission Number: ***MBTL-SEPA-DEIS-0000892***

Received: 5/24/2016 4:53:30 PM
Commenter: Montie Young
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I would like to add my support to the proposed port at Longview and ask that the DEIS be accepted as thorough and sufficient. The draft EIS for Millennium is exhaustive and sufficient. The project has been patiently seeking permits for five years. Southwest Washington needs family wage jobs and MBT will create them. Millennium Bulk Terminals in Longview is offering to create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.

Submission Number: ***MBTL-SEPA-DEIS-0002454***

Received: 6/10/2016 1:52:22 PM
Commenter: Paul Young
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am proud to add my voice in support of the Millennium Bulk Terminals project in Longview. The project is an excellent opportunity for the community and I am thrilled to see that Millennium has made strong commitments both to the economy and to the environment. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. Cowlitz County is fraught with uncertainty. Millennium's proposal, however, offers all the economic benefits of a long-term port facility without any of the uncertainty. Coal is needed by other countries to help shape their future and enhance their quality of life. Let's give other countries the living standards we have for ourselves.

Submission Number: ***MBTL-SEPA-DEIS-0002456***

Received: 6/10/2016 2:07:15 PM
Commenter: Paul Young
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am proud to add my voice in support of the Millennium Bulk Terminals project in Longview. The project is an excellent opportunity for the community and I am thrilled to see that Millennium has made strong commitments both to the economy and to the environment. Washington consumers know the meaning of hard work. We clock in and out every single day to ensure that our families have food on the table, a roof over their heads and other simple luxuries that support survival. That is why when an opportunity like Millennium Bulk Terminal project comes along that can offer more economic support through additional good-paying jobs and local revenue, we're quick to sign our support. Idling approval of MBT any longer is idling a chance to give households across Washington a better way of life. So I urge simply and directly: forgo any further delay on MBT. Consumers like myself are ready to utilize its potential. Cowlitz County is fraught with uncertainty. Millennium's proposal, however, offers all the economic benefits of a long-term port facility without any of the uncertainty. Coal is needed by other countries to help shape their future and enhance their quality of life. Let's give other countries the living standards we have for ourselves.

Submission Number: ***TRANS-PASCO-M2-00041***

Received: 6/2/2016 12:00:00 AM
Commenter: Rachel Young
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. Thank you for your time. My name is Rachel Young. I'm a nurse, I'm a mother, and I've lived in Richland for over 20 years.

I'm speaking more -- not so much as a perspective on public health but more as a mother. I'm here even though I hate giving speeches and I hate talking in front of people because I feel I need to look my daughter in the eye, and I need to know that I am responsible for her future and the future of the environment of the planet.

We all know that burning fossil fuels increases carbon levels in the atmosphere, the more the carbon levels in the atmosphere, it increases the temperature of the planet.

Here in Washington State in the center of an agricultural community, we're starting to feel the burn of that. We have farmers who have to rally for irrigation in the summertime and that affects Washington jobs.

We need our children when they grow up not to just have jobs but we need them to have a viable state, viable country, and that's the real cost here.

It's nice to make money and I'm a total capitalist, but we need to do it with caution. We need to all feel responsible for the decisions we make today that affect them and their tomorrow. Thanks.

Submission Number: ***MBTL-SEPA-DEIS-0002267***

Received: 6/9/2016 1:05:25 PM
Commenter: Cecilia Youngs
Organization: Attorney at Law
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Thank you for the opportunity to comment. The coal dust from the proposed terminal would greatly increase air pollution and cause serious danger to public health and the environment. As trustees of the resources of the public trust, you have a duty to protect the public's right to breathe clean air for current and future generations. This right cannot be traded away for private gain, and to do so would be a violation of your duty. It is unconscionable that we would allow the public's right to breathe clean air to be traded away for a country that disregards the health of its own citizens. Please do not allow this terminal to be constructed.

YRJANSON, RICHARD (0322)

Submission Number: ***MBTL-SEPA-DEIS-0000322***

Received: 5/11/2016 1:54:35 AM
Commenter: RICHARD YRJANSON
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I support a comprehensive environmental review of the proposed Millennium Bulk Terminal in Longview and wan to underscore my strong support for the approval of this project. The Millennium terminal will ensure Washington can maintain and grow its trade infrastructure. Green lighting this terminal would increase our ability to ship products abroad to growing market, thereby spurring greater investments at home. Washington has long depended on trade and exports as vital part of our economy, directly and indirectly creating nearly 40 percent of all of our stat's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. Now that a thorough review is complete, I strongly urge final approval of Millennium Bulk Terminal.

Submission Number: ***MBTL-SEPA-DEIS-0001890***

Received: 6/2/2016 11:55:32 PM
Commenter: Hugh Zackheim
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

I oppose the proposed Millennium Bulk Terminals (MBT) coal export facility in Longview. The environmental effects to the local area, to the coal mining region and to the communities along the transportation route from the coal fields to the port are substantial and exceptionally adverse. These costs of the project to society far exceed its economic benefit, which in fact are limited to a few investors. I urge you to deny the permit for the proposed coal port in Longview.
Sincerely,

Zahlen, Gary (0690)

Submission Number: ***MBTL-SEPA-DEIS-0000690***

Received: 5/23/2016 12:36:09 PM
Commenter: Gary Zahlen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am writing about the Millennium coal export project. I believe this project is good for the community. In Longview, 56% of kids need free and reduced price lunch at schools and go home to neighborhoods facing 8% unemployment. We cannot afford to look the other way when projects in this area guarantee new jobs and private investment in our schools, roads, and local services. In fact, the estimated number of jobs related to construction activity at the Millennium Bulk Terminals project is 1,350 temporary direct jobs - that will mean $70 million in direct wages! When the project is completed there will be about 135 direct jobs and about 165 indirect jobs. These numbers simply cannot be ignored. Remember this project's economic benefits to the local community. Millennium Bulk Terminals has done a great deal to assure that environmental protections are put in place for its proposed import/export terminal. I see Millennium as being an asset to the surrounding communities and the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Submission Number: ***MBTL-SEPA-DEIS-0002573***

Received: 6/13/2016 1:30:15 AM
Commenter: Andy Zahn
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I am in favor of the "no action" alternative in the Millennium Bulk Terminals Draft Environmental Impact Statement (EIS). Millennium's proposed coal export terminal would harm communities throughout the Northwest, with the worst impacts felt in Longview, Washington, near the proposed terminal site - while undermining the state's hard work to combat climate change to protect future generations. The project endangers our safety, health, air and water quality, and natural resources. I urge your agencies to protect natural resources and public health. The exportation of coal must not be allowed. The Millennium Bulk Terminal must not be built.

Submission Number: ***MBTL-SEPA-DEIS-0001289***

Received: 5/26/2016 6:43:06 PM
Commenter: Mike Zainfeld
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. Cowlitz County continues to have a high unemployment rate. We need these jobs and we've paid a high cost with this drawn out permitting process so far. It's time to stop the delay and bring about development and economic relief. Our region is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal will help our recovery. Thank you for beginning the scoping process.

Submission Number: ***MBTL-SEPA-DEIS-0000182***

Received: 5/10/2016 3:15:06 PM
Commenter: Drew Zangle
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text
This is a very bad idea with many negative environmental consequences. It is time to take action against climate change. Do not allow this proposal to go through, the impact from the transportation of coal exports alone will have dire consequences long term.

Submission Number: ***TRANS-SPOKANE-M2-00029***

Received: 5/26/2016 12:00:00 AM
Commenter: Cindy Zapotocky
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. I'm Cindy Zapotocky, I'm a resident of Spokane, Washington. I was born in Salem, Washington. I want to say, I welcome this very clean modern plant. Just like the trained companies have spent billions of dollars do make their trains fast, efficient, and safe, so have the plants of the United States jumped through environmental hoops to satisfy regulators.

We're seeing huge efficient, safe plants and we need more of them. Millennium has jumped through the hoops that you've put in front of them. And, frankly, as a housewife and a mother of four sons, I welcome that attitude of filling out all of your paperwork and satisfying every question that you had.

I'm convinced that they are responsible, and I welcome their business and their industry in our state.

We need that in our state. Even though what Rick said about coal plants being shuddered, that's because of regulations under the Obama administration. This is frightening to me. We're losing thousands of jobs due to these regulations, and I am concerned.

Eighty percent of the energy in the Eastern U.S. is provided by coal. We have the cleanest coal energy on the face of the earth. And so, again, I question that this is a dirty, antiquated thing.

It's modern, it's been updated, and we need to look at the truth of those statements.

I'm not afraid of the trains. I think that as Americans have always overcome obstacles and we're ready to move forward. And so we will meet the challenges as the people. Thank you very much.

Addendum to my testimony -

1. Coal is a rock! It's pollution potential is minimal - that is scientific!
2. Our trains and plants in America are the most low polluting on the planet. Billions of dollars are spent yearly to keep them clean and safe! Scientific fact!
3. Forest fires are caused in our area lately by bad forest management - not global warming! Cut old trees - don't let them burn! Scientific fact

Cindy Zapotocky
Spokane, WA
509-389-1141

Call me if you want fact sheets

It is so sad for citizens like me, born in Washington state, to see a few angry agitators stop progress in our state. Re-fitting an old Alcoa plant is an awesome recycling project that will cost effectively provide future jobs for our children. Foot dragging on projects like this only turns investors away from our state. Let's get going and approve the bulk terminal!

Submission Number: ***TRANS-SPOKANE-Q2-00008***

Received: 5/26/2016 12:00:00 AM
Commenter: Ken Zaretzke
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name's Ken Zaretzke from Spokane. We've already reached peak oil. Peak gas is just a couple of decades away. Peak coal may arrive sooner than we think. This is because it gets harder, and harder, and less economical to get it out of the ground as it is continually mined. Probably half of the coal will be too expensive to get out.

Of course, we can always tear down the Rocky Mountains. Lots of coal there. But as a backpacker, I hope we don't go that far to quench our addiction to fossil fuels. The sooner we stop being in denial about the problem of peak oil, the better able we will be to meet the energy challenges of the future. To dig up and burn a huge amount of coal out of the Powder River Basin will only mean being in denial until it is insanely harder to meet those challenges.

Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000877***

Received: 5/24/2016 4:43:28 PM
Commenter: Alan Zeidman
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Longview port should be accepted as sufficient sooner rather than later. I support this plan and the many positive economic and environmental benefits it will reap. An excessive review process will further impede the creation of jobs where they are so desperately needed. Cowlitz County has one of the worst unemployment rates in the state, at 8 percent. Solving this jobs crisis needs to be the foremost priority of our government. And, indeed, we can have both economic growth and a healthy environment. Millennium is creating hundreds of family-wage jobs AND cleaning up the old Reynolds site, maintaining the health of the Columbia River and using state-of-the-art covered loading and unloading systems at its terminal. Here I see an opportunity to return many critically needed jobs to Washington State. It is paramount for the local, state, and national economies to seize every option they have to aid in their recovery. I urge you to take these comments in consideration and let’s get Millennium Bulk Terminals to begin hiring and exporting. Thank you.

May 13, 2016

Elaine Placido
Director, Building and Planning Cowlitz County
207 4th Avenue North
Kelso, WA 98626
PlacidoE@co.cowlitz.wa.us

Sally Toteff Director
Southwest Regional Office
Washington State Department of Ecology
300 Desmond Drive SE Lacey, WA 98503
sally.toteff@ecy.wa.gov

Longview SEPA EIS
c/o ICF International
710 Second Avenue, Suite 550,
Seattle, WA 98104

Dear Elaine Placido, Sally Toteff and ICF International:

RE: Millennium Bulk Terminals—Longview Coal Export Facility DEIS

Thank you for the opportunity to comment on your draft environmental impact statement for the proposed Longview Coal Export Facility at Millennium Bulk Terminals.

I commend you on an impact statement on a fossil fuel export facility that includes an assessment of greenhouse gas impacts from the product exported. In that regard a much more complete assessment of impacts was included than has to date appeared in other EISs on fossil fuel export facilities planned for the Northwest. There are still serious questions on cumulative impacts from this proposal alone and in conjunction with other fossil fuel export facilities planned for our state.

Public and Tribal Resource Impacts

The Lower Columbia is an estuary of National Significance with very high resource value for fish and wildlife with high diversity from mudflats, eelgrass to tidal surge plains. Tidal influences flows upstream to Bonneville. The majority of Columbia Basin salmon and steelhead stocks are listed under the ESA. The salmonids provide important tribal commercial and sports fisheries. To protect stocks Oregon and Washington have sports/commercial fish net pen rearing in Lower Columbia River and Off-Channel Areas in Oregon and Washington.

Your document states accurately: "Tribal Resources Activities related to the Proposed Action would cause physical or behavioral responses in fish or affect aquatic habitat in the Columbia River. These impacts could reduce the number of fish surviving to adulthood and returning to areas upstream of Bonneville Dam, thereby affecting the number of fish available for harvest by the tribes. But because of

other on-going impacts to the resource you conclude that quantifying impacts is difficult and "Making a determination of significance related to treaty reserved rights related to traditional fishing sites on the Columbia River is not determined in this SEPA Draft EIS." Yet this is a key question that needs to be answered.

RE: Fish resource: When you have an at-risk resource guaranteed by treaty and also in public ownership, how many cumulative cuts or reductions to that resource leads to extinction of those resources? This proposal adds impacts to those fish resources from ballast waters, spills, dredging, prop wash and with increased shipping activity, water quality impacts into rail ditches and surface water from rail lines. The magnitude of this project is large and risk to resources from operation and accident is increased.

Consistency with International Climate Needs and Efforts

Your Final EIS should identify conflicts with national and international needs and goals to transition off fossil fuels to totally renewable energy resources. It should also include an alternative assessment such as exporting solar, wind or tidal energy generation would compare with that in terms of meeting urgent needs to reduce climate impacts. SEPA legislation stresses need to support international efforts. See: SEPA Legislation RCW 43.21C.030 (Guidelines for state agencies, local governments—Statements—Reports—Advice—Information) states: " *(f) Recognize the worldwide and long-range character of environmental problems and, where consistent with state policy, 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;".*

How does this coal export facility proposal fit with goals of last December's International Climate agreement to keep temperatures to no more than 1.5 degrees Celsius?

Scientists, 195 national leaders at Paris UN Conference and world religious leaders have pointed out the need to end the fossil fuel era to reduce worst effects of Climate Change and keep fossil fuels in the ground to have a livable planet for us and for our children and grandchildren. Recent studies have shown ever more sea level rise impacts than previously thought:
http://www.nytimes.com/2016/03/31/science/global-warming-antarctica-ice-sheet-sea-level-rise.html?smprod=nytcore-iphone&smid=nytcore-iphone-share&_r=0

Public Entities like the County, State and Federal agencies have a responsibility to provide for public health, safety and welfare. Young people in Seattle challenged the State for the lack of political will to act on climate change greenhouse gas emissions and won. King County Superior Court Judge Hollis Hill has ruled that the threat of climate change is so urgent that the state must be placed on a court-ordered deadline to hold polluters accountable now. She commented: "The reason I'm doing this is because this is an urgent situation. (...) These children can't wait, the polar bears can't wait, the people of Bangladesh can't wait. I don't have jurisdiction over their needs in this matter, but I do have jurisdiction in this court, and for that reason I'm taking this action."

http://legacy.king5.com/story/tech/science/environment/2015/06/24/climate-change-ecology-judge-king-county/29221839/

This coal export facility proposal creates serious environmental and moral crisis because of serious and life threating impacts to the poor from Bangladesh to Native Communities in the US. We are currently at a threshold in the Northwest in how we respond to the need to protect public health, safety and welfare.

Again thank you for the opportunity to comment.

Sincerely,

Bob Zeigler

Bob Zeigler
1102 Creekwood Ct. SE
Olympia, WA 98501
zeiglerbob@msn.com
(360) 570-0848

Submission Number: ***TRANS-SPOKANE-Q3-00001***

Received: 5/26/2016 12:00:00 AM
Commenter: Denise Zembryki
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

I support the no action alternative in the Millennium Bulk Terminal's Draft EIS. The project harms our health and safety air and water quality and natural resources.

The Draft EIS is demonstrates Millennium would have a severe impact on rail and road congestion. I live in North Idaho and the road to my home crosses railroad tracks. I would be directly impacted by an increase in railroad traffic.

Climate change. Considering rail and vessel emissions along, this project would be one of the biggest greenhouse gas emitters in Washington state.

Health and environment. In some instances the Draft EIS claims mitigation can reduce coal dust, rail traffic, and other project impacts. For example, to mitigate coal dust from the material the Draft EIS proposes a reporting process for coal dust complaints. A phone call or email to complain about coal dust following a person's lungs, home, and river is not mitigation.

I have asthma and air quality is not an abstract issue for me personally. I would not want to be living any place near the proposed.

Some specifics. Sulfer dioxide is a major air pollutant and has significant impacts upon human health. In addition, the concentration of So2 in the atmosphere can influence the habitat suitability for plant communities as well as animal life.

The following are taken from the SEPA Draft EIS, Appendix One. Anthropogenic So2 emissions originate mainly from fossil fuel combustion with coal combustion being the largest source, representing about percent of all anthropogenic sources of So2 globally.

In China, the country with the highest So2 emission rates, coal combustion is responsible for about 84 percent of So2 emissions. Thirty percent of the annual average background sulphate in both the Western and Eastern U.S. was due to Trans-Pacific Asian Transport.

Various studies have examined the long-range transport of Asian mercury emissions to North America and show that travel time from East Asia to the Pacific Northwest was about ten days.

Because of the large amount of coal consumed in East Asia, which is projected to increase, and because studies show long-range transport from East Asia to North America is a frequent occurrence, several global modeling studies explore the impact of mercury emission from East Asia on North America.

The first such assessment, 2004, reported that Asian mercury emissions were estimated to contribute between five and 36 percent of the total mercury deposition in the U.S.

I urge you to protect public health, natural resources, and the environment. Reject coal export. Denise Zimbrucki, Sagle, Idaho.

Submission Number: ***MBTL-SEPA-DEIS-0002891***

Received: 6/13/2016 3:01:32 PM
Commenter: Bill Zickert
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, Thank you for taking the time to review my comments about the proposed Millennium Bulk Terminal project in Longview. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed project would provide. This is important for the sake of all of Washington's work force. Now that the project has been adequately reviewed and a thorough draft EIS for Millennium has been released by your agencies, it now time to move this process forward to support the creation of thousands of family wage jobs in Southwest Washington. Washington has been historically known for its steadfast commitment to the environment as well our booming trade based economy. We are appreciative of the state and county's careful and thoughtful review of the project and believe the health of our community is safe under the guidelines of the proposed project. As you may well know, Cowlitz County posted 7.3 percent unemployment in 2015, far higher than both the overall state and the nation. And with many of today's unemployed being blue-collar workers trained in the trades, the construction of this project, it's ongoing maritime operations, the ensuing feeder rail lines and other services will provide just the economic stimulus we need in this part of the state. It is crucial that we encourage investments that will produce opportunities for Washington's citizens to work. At its outset, Millennium Bulk's site modernization would produce as many as 2,650 direct and indirect new jobs during the construction phase and at least 300 full time jobs remaining afterwards. The terminal would also generate $70 million in wages during construction, the reinvestment of which would indirectly create even more jobs. The local and state economies are need of a boost, and Millennium Bulk's new terminal would more than deliver the answer labor needs. Furthermore, if Washington does not seize this opportunity, others in Canada and California will. It is hardly a question of the terminal's suitability, but rather an opportunity to create new jobs. Washingtonians are ready to work, and Millennium's terminal at Longview would give thousands of them that chance. The environment is important, and it is critical that the terminal gets a thorough, and timely, evaluation. Yet now, after an extensive and exhaustive four-year review, it's time for the co-lead agencies to approve this project. Hardworking Cowlitz County citizens, and others throughout the region, are counting on the opportunity to demonstrate their resolve. Thank you for your time.

Submission Number: ***MBTL-SEPA-DEIS-0000401***

Received: 5/17/2016 6:19:51 PM
Commenter: Daniel Zintz
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The draft environmental study for Millennium Bulk Terminals coal export facility was sufficient. Please move forward. There are many benefits of the project that the community is waiting for. At a time when Washington needs jobs, we cannot turn away the kind of opportunity that the proposed Millennium Bulk Terminal would provide. The project would create work right away during construction, and plenty more jobs would stay around to run the terminal. Plus, all of those wages generated would trickle back into our local and state economies. At a time when our state unemployment rates are below the national average, we cannot miss big opportunities for new business like this one. Enough with the schedule delays, bring this process to a close.

Submission Number: ***TRANS-SPOKANE-M2-00046***

Received: 5/26/2016 12:00:00 AM
Commenter: Michael Zookoski, Ph.D.
Organization: National Science Foundation
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Hi. My name is Michael Zookoski (phonetic). I teach anthropology at a local university. I'm a Ph.D. I've done some research with the National Science Foundation, which is social science issues mostly.

But my interests also deal with the environment, and I'm very concerned and strongly oppose the development of this facility for general reasons.

The first reason is the issue of global climate change that we've heard about. In the context of global climate change which the majority of the scientific community now supports, and it's essential that we stay within that two to three degrees of warming.

This is just simply the wrong kind of development for Washington state and for the United States more generally. The U.S. has recently signed the international Paris agreement and we're committed to -- in the future, right -- reducing our fossil fuel use and carbon emissions.

The Draft EIS itself states clearly that it's going to increase carbon emissions by 37 million metric tons. Yet we're clear at this point in the scientific community within many federal and state agencies that we need to regulate and limit our existing carbon emissions.

So this strikes me as completely wrong. It goes a totally wrong direction for our state. But we've heard a lot about the dynamic of jobs, right, versus the climate. Yet we do need to transition to renewable energy sources, cleaner energy sources. And that transition can give huge boom for our.

Economy but we're still dealing with, right, the impact of the concentration of power and capital in fossil fuel companies, and we really need to move beyond that. So I really support you. Thank you.

Submission Number: ***TRANS-LV-Q2-00012***

Received: 5/24/2016 12:00:00 AM
Commenter: Jan Zuckerman
Organization:
State: Washington

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

My name is Jan Zuckerman. And I am a teacher and have spent hundreds of hours with students learning in nature. In June of 2013, my middle school class was invited to spend our year-end party at a beautiful farm in Ridgefield, Washington, which borders on the Ridgefield National Wildlife Refuge. There, the family took us on a tour of their farm. Our hosts, Abby and David, told us about the area as we explored a historical barn and visited the Lancaster home, the oldest frame house in Washington state on the south side of the Lewis River. I remember vividly that beautiful old house standing tall and white engulfed in memories. While admiring it, several of my students noticed that the side facing the river was stained gray. When they asked what caused the discoloration, David explained that it was due to the coal dust from the trains that pass by daily. Back at school, we had just learned about the science and sources of energy and their impact on climate change. And my students were very aware of the dangers of coal. They were sickened by his story, yet they found it difficult to believe that the dust could drift so far. Later, as we stood inside the historic barn that David so painstakingly restored to its original state, we felt the ground rumble and heard what sounded like a roar. We quickly left the barn to witness a coal train pass by. At first my students stood there motionless. However, it did not take long for them to begin shouting and pointing to the coal dust that hovered in the clouds over the open beds. They were stunned and looked to me for some kind of consolation, but I had nothing to offer them. I was at a loss for words, myself, as I tried to make sense of the beauty of this place, a tribute to the builders ingenuity and devotion to creating a structure that could be passed down for generations contrasted with the contamination caused to our air, water, and land with poisonous mercury, arsenic, and lead by a resource that is finite and deadly to our planet. I was angry, and sad, and felt the need to apologize to the children who were concerned for the wildlife and their future. Three years have passed since that moment in Ridgefield, and we have run out of time. The Millennium Bulk Terminal's EIS must consider the risk to the terminal communities, the wildlife that we share, the planet with the carbon emissions resulting from the transport of the 44 million tons of coal a year. Please, for the sake of our children and future generations of all life on this planet, take immediate action to deny the permit for the terminal. The students should not have to shout to be heard. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0002643***

Received: 6/13/2016 12:06:57 PM
Commenter: Jenni Zuehlsdorff
Organization:
State: Montana

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Dear Agency Staff, I support the proposed port facility in Longview. The environmental review of this project has taken too long and it is time to allow Millennium to invest $680 million in southwest Washington. The new bulk commodity export facility will revitalize an old, underutilized industrial site. Millennium is cleaning up the site and the new project will create hundreds of jobs. Washington can have economic development while still protecting the environment. The draft EIS for this project is extremely thorough. It is now time to put southwest Washington to work. Please publish the final EIS quickly and issue the permits. Thank you.

Submission Number: ***MBTL-SEPA-DEIS-0000633***

Received: 5/20/2016 1:15:16 PM
Commenter: K.E. Zulauf
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The environmental study for the Cowlitz County port should be completed expeditiously. Any American operation that puts people back to work should be supported in these tough economic times. After five years, we have an exhaustive draft EIS for Millennium. Instead of more delays, we should move forward with this project, ensuring it meets the environmental requirements. No more or no less should be expected. This project will create additional revenue for a state that, like many others, can really use the economic boost. Through the entire construction process it will employ a significant amount of people and go a long way toward revitalizing Washington. I feel we should make this coal export terminal a reality. Thank you for considering my comments.

Submission Number: ***MBTL-SEPA-DEIS-0001413***

Received: 5/26/2016 7:55:44 PM
Commenter: Cindy Zumbrennen
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

Thank you for the opportunity to contribute to the comments for the Millennium Bulk Terminals Longview draft EIS. I support this project and hope to see it up and running as soon as possible. Remember the fact that as Columbia River vessel traffic has declined 30%, from a peak of 2021 ships in the year 2000 to 1404 ships in 2011, increased vessel traffic as the increased volume will be replacing lost vessel traffic not increasing total volumes. Millennium will be a positive impact of increased vessel traffic in such areas as reducing pilotage costs and increasing the port service infrastructure (e.g. additional tugs to serve the lower Columbia River). Despite some negative opinions, this permitting process will produce facts that show a modern port can be planned by a company, then evaluated by an agency to provide ways for production portals, while at the same time protecting the environment and enhancing the socio-economics of a region. It will be a job well done!

Submission Number: ***MBTL-SEPA-DEIS-0002191***

Received: 6/7/2016 7:10:22 PM
Commenter: Dana Zumot
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Department of Ecology should speedily complete the permitting for Millennium Bulk Terminals. This draft EIS is exhaustive; there is nothing further to study. Coal is an abundant commodity that moves freely in a global market. Asian economies consumed over 5 billion tons of coal in 2012 without any exports through Washington ports. Additional supplies to feed that market are coming on line from Australia, Indonesia, South America and Mongolia, and domestic supplies in China are becoming more readily available. Assuming that incrementally new GHG releases will result from some portion, or all, of future coal exports from a new terminal in Longview Washington that, at maximum capacity, would amount to less than 1% of Asian coal use, requires a degree of speculation that is not permissible under SEPA or NEPA. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0002212***

Received: 6/7/2016 7:26:09 PM
Commenter: Dana ZUMOT
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

The Department of Ecology should speedily complete the permitting for Millennium Bulk Terminals. This draft EIS is exhaustive; there is nothing further to study. Coal is an abundant commodity that moves freely in a global market. Asian economies consumed over 5 billion tons of coal in 2012 without any exports through Washington ports. Additional supplies to feed that market are coming on line from Australia, Indonesia, South America and Mongolia, and domestic supplies in China are becoming more readily available. Assuming that incrementally new GHG releases will result from some portion, or all, of future coal exports from a new terminal in Longview Washington that, at maximum capacity, would amount to less than 1% of Asian coal use, requires a degree of speculation that is not permissible under SEPA or NEPA. We need to move this project along. Thank you for your consideration.

Submission Number: ***MBTL-SEPA-DEIS-0002597***

Received: 6/13/2016 10:56:47 AM
Commenter: Scott Zundel
Organization:
State: Idaho

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments

Submission Text

Dear Cowlitz County and Washington Department of Ecology, I applaud both Cowlitz County and the Washington Department of Ecology for conducting a comprehensive and sufficient environmental review of the proposed Millennium Bulk Terminal in Longview and want to underscore my strong support for the approval of this project. First, an opportunity like Millennium will ensure Washington can maintain and grow its trade infrastructure. Greenlighting this terminal would increase our ability to ship products abroad to growing markets, thereby spurring greater investments at home. The terminal would also allow our state to compete more closely with other trade markets in North America including trade terminals in Canada and California. The benefits for local communities are equally noteworthy. Washington has long depended on trade and exports a vital portion of our economy, directly and indirectly creating nearly 40 percent of all of our state's jobs. Ushering in developments like Millennium Bulk Terminals – now thoroughly reviewed and vetted – will provide critical economic opportunities for local communities throughout Washington. It could create as many as 2,650 direct and indirect jobs during construction, with 300 direct and indirect opportunities supporting the community once the project is complete. The local economy would also see an additional $5.9 million in tax revenue during construction and an additional $1.7 million annually post-construction. Both of these are on top of the state's tax revenue estimated at $37.2 million during construction and $2.2 million annually thereafter. The study phase of Millennium was an important opportunity for both of your departments to exhaustively examine the project's potential impacts, and from that, develop appropriate mitigation measures that would avoid or minimize these findings. Now outfitted with the thorough review, I strongly urge the co-agency leads to continue the permitting process for Millennium Bulk Terminal project with the hope of final approval. The benefits to businesses across the state, and those who they employ and our local economy are too great to ignore. I thank you for the opportunity to comment.

Submission Number: ***TRANS-SPOKANE-Q4-00001***

Received: 5/26/2016 12:00:00 AM
Commenter: Jeremy Zutter
Organization:
State:

Agency: Cowlitz County and the Washington Department of Ecology
Initiative: Millennium Bulk-Terminals Longview SEPA DEIS
Attachments: No Attachments
Submission Text

My name is Jeremy Zutter, Z-U-T-T-E-R, and I am testifying on my account according to the train and coal exports today.

It's my findings that it is fundamental that we move forward in no coal exports and that the opposition is derived from privatized profiteering. According to the populous in which I've just exposed myself today, the significance was that the individuals who were collected in support of coal and the terminal were very violent and rude and harassing and didn't have an agenda for the greater humanity or our culture and consciousness as a collective, and the populous that are representing and collected organically around the no coal export were very welcoming and have an interest that is for the greater good of all. That statement alone says a lot about the evidence of what the issue is in itself based on social behavior and its findings.

The pollution is a serious concern for us to address. The greatest issues beyond coal is the trains and one significant attribute I'd like to acknowledge is the noise and vibrations of the trains.

BNSF is notorious for not maintenancing their trains, for being liars, deceivers, and solely driven by their private profiteering.

The community in Spokane where I reside is constantly under noise terrorism from the trains due to lack of maintenance, constant horn blowing, and it's passing through the community area. This affects the consciousness, mental health, and wellness of our families and persons of the community.

This issue is greater than just the coal. However, in addressing the coal issue, is it very clear and a strong support in no coal export in this reference is my testimony today.