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Col. Buck
Army Corps of Engineers
Millennium Bulk Coal Project

Col. Buck & To whom it may concern:

The draft EIS has so many deficiencies. The following are some significant areas that the draft EIS does not sufficiently address. Let us begin with the deficiencies in scoping the proposed project. Confining the subject study area to areas immediately adjacent to the facility and its docks does not take into account all the relevant facts:

1) The August 1, 2016 White House Memo from the Council for Environmental Quality clearly states that in "All NEPA reviews all Federal agencies must include the reasonably foreseeable effects of various phases in the process, such as clearing land for the project, building access roads, extraction, transport, refining, processing, using the resource, disassembly, disposal, and reclamation. Depending on the relationship between any of the phases, as well as the authority under which they may be carried out, agencies should use the analytical scope that best informs their decision-making."
"The agency should focus on significant potential effects and conduct an analysis that is proportionate to the environmental consequences of the proposed action. Agencies can rely on basic NEPA principles to determine and explain the reasonable parameters of their analyses in order to disclose the reasonably foreseeable effects that may result from their proposed actions. " (From page 13 of the memorandum)

Therefore, the rail transport of the coal and the effects of that transport to the communities and ecological environments along the route should be included in the EIS.
Please note that this would also include the extraction of the coal from the ground.

2) The combustibility of the coal was not properly addressed in the draft EIS. This would include the possibility of potential fires or explosions from coal dust along the transportation route and at the terminal? Powder River Basin coal is particularly combustible but this was not addressed in the draft EIS.

3) The effect of the coal dust on the degradation of the track and the surrounding environment was not measured or studied.

4) The effect of the coal dust on the river ecology and fish was not included in the study.

5) The possibility of the effects of the coal interfering with the 1855 fishing treaty rights of Native American tribes along the route was not examined.

6) The audio effects on the hearing for the residents of all the nearby communities was incorrectly measured without proper professional assistance. The White House memorandum clearly addresses the need for this. From page 21 of the memo, " The analysis of climate change effects should focus on those aspects of the human environment that are impacted by both the proposed action and climate change. "

7) The draft EIS did not consider the effect of the Washington Department of Ecology Rule requiring businesses to cap and

reduce carbon emissions. Under the new rule, businesses that are responsible for 100,000 metric tons of carbon pollution annually will be required to cap and then gradually reduce their emissions.

8) The draft EIS did not adequately address the increase in river traffic from the vessels serving the terminal. With a the dangerous crossing of what is known in marine navigation as "Graveyard of the Pacific", the Columbia River Bar, there was no mention of the Coast Guard or consultations with the Bar Pilots organization to see if an increase of that magnitude is even possible on a year round basis. There are huge questions about what would happen in the event of a closure of the bar. Would the coal keep coming in? Where would it be stored? Would the ships weather the storm out at sea? The draft EIS makes NO mention of these possibilities.

9) The effects of collisions with other vessels or a sand bar or piling were measured but there was no adequate study of the resources required or available to attend to such a disaster, let alone the effect such a disaster might have on existing river traffic to Portland or Vancouver. The study admits that there is a possibility of almost 3 such incidents per year but makes no mention of emergency response or preparedness for such accidents. With the number of ships using the river increasing by nearly double, the risk for accidents is increased by half as many more so it is possible that we could have up to 6 incidents per year as a result of the increased traffic.

10) The proposed dredging operation for construction of the docks would take place in the August to December time frame. Yet this is exactly the prime time for the biggest run of salmon in the river during the entire year. A person can only conclude that the study did not include a fisheries biologist. This is

especially perplexing because the study notes the times during the year that these migrations occur.

11) There was no mention of the economic viability of the project in the long term. The companies proposing this are either in bankruptcy or receivership so the economic viability of the project should be addressed.

12) The Federal Government and the Corps of Engineers have spent over a $ 1 Billion dollars to save the endangered salmon species on the Columbia River.
There are 12 listed species of salmonids on the Columbia River that are listed as endangered. That is an undisputable fact. Construction and use of the Millennium Bulk Terminal would pose a threat to these endangered fish. There is no mitigation available for a lost species.

13) One of the most life threatening possibilities for young salmon fry is grounding on a sand bar because of prop wash and waves from passing ships. One of the three most dangerous areas for grounding salmon fry is just below where the docks for the proposed terminal would be placed. It is only common sense that the construction and use of these docks would only increase ship traffic by nearly double and thus increase the possibility of grounding salmon fry. Yet, the draft EIS does not account for this possibility or offer mitigation for such an eventuality.

Therefore, I oppose the Millennium Bulk Project for 6 main reasons.

1) The rail transportation to the terminal down the Columbia River endangers the health and safety of the communities along the rail line. It is not a matter of if there is going to be an accident; it is a matter of when the

accident will happen. In fact the draft EIS acknowledges this as a fact but does not address the consequences in any meaningful way.

2) Any train derailment along the river could send toxic chemicals into the river thereby endangering the already endangered fish and the rest of the river ecology.

3) There is no good time for dredging for this project. Salmonids use the river for transportation year round so the dredging that would be necessary for this project would be another setback for these endangered fish. The draft EIS makes note of this fact but offers no measures of mitigation for this circumstance.

4) The number of additional vessels in the river to service this terminal will be a danger to other vessels in the river and coming over the Graveyard of the Pacific, the Columbia River Bar would just become another disaster waiting to happen.

5) Finally, with global warming, there is NO reason to ship coal to Asia so that the dirty air created by coal fired plants returns to us as toxic rain while further increasing global warming and climate change.

6) The draft EIS did not include recent carbon emission guidelines and standards from the White House and the State of Washington.

Therefore, I urge you deny the permit of this terminal in order to protect the fish, the environment, the health of safety of the people living along the river, and for our own Mother Earth as well.

Sincerely yours
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