

November 23, 2016

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

**RE: Comments for Draft Environmental Impact Statement (EIS)
Millennium Bulk Terminals - Longview**

Dear Millennium Bulk Terminals-Longview NEPA EIS:

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 Barge Lines is a marine transportation and terminal company based in the Pacific Northwest and employs approximately 275 people. Tidewater has been in business since 1932 and operates a fleet of towboats and barges and marine terminals on the Columbia Snake River system.

Tidewater is committed to environmental stewardship in the Pacific Northwest and its waterways. That being said, we have reviewed the Draft EIS 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 Draft EIS 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 Draft EIS:

Chapter 6: Operations: Affected Environmental and Project Impacts

Section 6.4: Vessel Transportation

We wanted to make note that Tidewater and other the towing operators on the Columbia River have been safely operating for many years. Furthermore, our industry's incident statistics and safety record shows that the towing industry in Washington has one of the most proactive and audit-heavy programs in the nation, ensuring that we meet and exceed all regulatory requirements that provide for safe and environmentally friendly transportation.

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 incident on the Columbia River system. We did not find mention of our capabilities in the Draft EIS, so we wanted to make note of the following information:

Tidewater is a Primary Response Contractor for Washington State's Department of Ecology and is able to respond to an incident on 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 an incident on 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**
- **HAZWOPER Trained Personnel – 65 People**
- **ICS Trained Personnel – 75 People**

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 growth of family-wage jobs in Washington and throughout the Pacific Northwest.

In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our marine infrastructure, 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