



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
620 SW Main Street, Suite 201  
Portland, Oregon 97205-3026

IN REPLY REFER TO:  
9043.1  
ER16/0571

November 29, 2016

Attn: Danette L. Guy, Biologist/Project Manager  
Millennium Bulk Terminals–Longview NEPA EIS  
c/o ICF International  
710 Second Avenue, Suite 550  
Seattle, WA 98104

Dear Ms. Guy:

On September 30, 2016, the U.S. Army Corps of Engineers – Seattle District (Corps) and Washington State Department of Ecology (DOE) announced the availability of a Draft Environmental Impact Statement (DEIS) for the Millennium Bulk Terminals Longview Coal Export Terminal (Millennium Longview Coal Terminal). Millennium Bulk Terminals Longview, LLC (the Applicant) proposes to construct and operate, for a term of approximately 30 years, a 44 million metric ton per year coal-by-rail marine terminal located on the lower Columbia River near Longview, Washington. The Department of the Interior (Department) is concerned that the proposal has the potential to adversely impact fish, wildlife, and tribal trust resources. Based on the information provided in the DEIS, the Department supports the selection of the No-Action Alternative and provides the following comments for use in the development of the Final Environmental Impact Statement (FEIS).

The Department has responsibility for managing or co-managing a variety of federal trust resources. The U.S. Fish and Wildlife Service (Service), one of the Department's component bureaus, specifically has responsibility for managing sensitive species which are listed under the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*)(ESA), their habitats and designated critical habitat, federal wildlife refuges, and other fish and wildlife trust resources. Within the study area, including more than 320 linear miles of the middle and lower Columbia River, these trust resources include the following: 1) bull trout (*Salvelinus confluentus*, threatened; Coastal and Mid-Columbia Recovery Units); 2) Columbian white-tailed deer (*Odocoileus virginianus leucurus*, threatened); 3) streaked horned lark (*Eremophila alpestris strigata*, threatened); 4) designated critical habitat for the bull trout and streaked horned lark, 5) numerous candidate species and species proposed for listing; 6) several National Wildlife Refuges and federally administered fish hatcheries; 7) shorebird, waterfowl, and migratory bird populations, including habitats of great importance to the entire Pacific flyway; and 8) jointly managed Tribal, commercial, and recreational fisheries.

The Service is also committed to implementing the goals, objectives, and policy principles outlined in our Native American Policy (USFWS 2016b) and Secretarial Order 3206 (U.S. Department of the Interior and U.S. Department of Commerce 1997). The Service shares in the federal government's responsibility for accomplishing greater recognition and protection of treaty-protected resources and rights.

The Corps, Cowlitz County, and DOE received over 200,000 comments for the proposed action during the scoping period. Many of these comments expressed concern for aquatic resources, and the potential for damage to aquatic ecosystems, fisheries, and fishing areas on the Columbia River; damage to human health and natural resources from coal dust and diesel emissions; and, toxic air pollution, greenhouse gas (GHG) emissions, and resulting damage to the global climate system.

Nine Native American Tribes, Tribal Nations, and tribal organizations provided comments (Cowlitz County and DOE 2014; Scoping Summary Report, pp. 4-1 through 4-5): the Coeur D'Alene Tribe, Columbia River Inter-Tribal Fish Commission, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation, Cowlitz Indian Tribe, Nez Perce Tribe, Nisqually Indian Tribe, Upper Columbia United Tribes, and the Yakama Nation. All nine of the Native American Tribes, Tribal Nations, and tribal organizations expressed serious concern about foreseeable adverse impacts to treaty-protected resources and rights; most of these tribes and tribal organizations also openly expressed opposition to the proposal (Cowlitz County, DOE, and Corps 2016; Scoping Comments <<http://www.millenniumbulkeiswa.gov/comment-archive.html>>).

While the State Environmental Policy Act (SEPA) co-leads (Cowlitz County and DOE) have acknowledged and addressed potential impacts along the entire rail transport corridor, and their DEIS assessed the action's total (direct and indirect) net GHG emissions (including emissions attributable to end-use coal combustion in Asia and the United States), the Corps has narrowly defined the scope of their proposed action and constrained the National Environmental Policy Act (NEPA) study area(s). The NEPA DEIS does not address adverse impacts that would occur along the rail transport corridor. The NEPA DEIS considers GHG emissions resulting directly from construction and operations at the proposed terminal, but does not acknowledge or address end-use coal combustion or the action's foreseeable indirect effects to GHG emissions and climate change. The Department recommends that the FEIS address potential impacts along the entire rail and vessel transport corridors, and end-use coal combustion and the action's foreseeable indirect effects to GHG emissions and climate change.

The DEIS describes an "off-site alternative," located at a 220 acre site on the Columbia River at Barlow Point. The off-site alternative would result in modestly different direct impacts to wetlands and the Columbia River, but otherwise represents no meaningful change or reduction of the foreseeable, unavoidable, and significant adverse impacts. Also, the DEIS does not provide adequate information to support the Applicant's claim that there are inadequate West Coast terminals ("no existing West Coast terminals") to serve the stated need. The Department recommends that the FEIS consider and explain why the Preferred Alternative is a better choice than other alternatives, including the No-Action Alternative as well as a more thorough examination and assessment of the Applicant's claim that there is inadequate West Coast marine terminal capacity.

*Tribal Treaty Rights and Trust Resources* – The Corps, Cowlitz County, and DOE have acknowledged unavoidable and significant adverse impacts to cultural and tribal resources, including exclusion from and/or reduced access to the treaty-protected usual and accustomed places (e.g., fishing and hunting areas) of several treaty tribes. The proposed action would impact treaty-protected resources; fisheries, fish and wildlife, and the habitats and water quality upon which fish and wildlife depend. The proposed action would impact tribal fisheries, limit or curtail access to usual and accustomed areas, and infringe upon the treaty-reserved rights of tribes. Content included in the DEIS suggests that the Millennium Longview Coal Terminal would have unavoidable and significant adverse impacts to tribal treaty rights and trust resources (Cowlitz County and DOE 2016, Summary, pp. S-16, S-17, S-41; Corps of Engineers and DOE 2016c, Cumulative Impacts). In addition, to date, the Applicant and state and federal leads have failed to identify mitigation measures that would meaningfully and adequately avoid these significant impacts. The Department recommends that the FEIS include a detailed and comprehensive mitigation plan that fully addresses the action’s foreseeable adverse impacts to Tribal Treaty Rights and Trust Resources.

*Social and Community Resources* – The DEIS assesses and describes foreseeable impacts to social and community resources (Cowlitz County and DOE 2016, Summary, pp. S-12 through S-14, S-32, S-41; Corps of Engineers and DOE 2016c):

- “Trains [would] affect accessibility to community resources and public services ... because of increasing wait times at grade crossings.”
- “Trains ... would increase emergency vehicle delay at rail crossings.”
- “The proposed action would have a disproportionately high and adverse effect on minority and low-income populations.”

The rail transport corridor includes more than 200 at-grade crossings, including numerous under-protected crossings (USFWS 2016c). Increased rail traffic and resulting disruptions to community resources and access represent significant adverse impacts. To date, the Applicant and state and federal leads have failed to identify mitigation measures that would meaningfully and adequately avoid these significant impacts. The Department recommends that the FEIS include a detailed and comprehensive mitigation plan that fully addresses the action’s foreseeable adverse impacts to Social and Community Resources.

*Water Quality* – The DEIS assesses and describes foreseeable impacts to water quality (Cowlitz County and DOE 2016, Summary, pp. S-22 through S-24; Corps of Engineers and DOE 2016c):

- “Rail operations could release contaminants to water resources ... resulting in the potential for water quality impairment ... Fuel or hazardous materials spills from a vessel incident or a collision or derailment of a train would have [significant, adverse] impacts on water quality ... The magnitude of the potential impact would depend on the location of the spill, the volume of the spill, and weather and tidal conditions.”
- “Coal could enter water as either coal dust or as the result of a coal spill ... The potential risk for exposure to toxic chemicals contained in coal would be relatively low as these

chemicals tend to be bound in the matrix structure and not quickly or easily leached ... particles would be transported ... over a sufficiently broad area that a measurable increase in concentrations ... would be unlikely.”

- “Implementation of the proposed mitigation (Table S-2) ... [including measures to] monitor and reduce coal dust emissions in the project area could reduce impacts on water quality.”

The rail transport corridor includes significant known and unknown geologic hazards (e.g., areas with elevated landslide susceptibility). The rail transport corridor includes more than 200 linear miles of heavily trafficked rail located within 1 mile of the middle and lower Columbia River, and crosses or lies in close proximity to more than 500 unique waterbodies, 50 perennial streams and rivers, and more than 100 distinct fish-bearing reaches, river segments, and shoreline types (USFWS 2016c). Spills that occur at these locations are likely to result in significant adverse impacts to the Service’s trust resources.

The marine vessel transport corridor extends along more than 104 linear miles of the lower Columbia River. Along the lower Columbia River federal navigation channel, much of the land (more than 27 percent) and shoreline is specifically managed for habitat and biological diversity objectives, and more than 10 federal, state, and private wildlife or natural areas could be affected (including the Service’s Julia Butler Hansen and Lewis and Clark National Wildlife Refuges)(USFWS 2016c). According to information included in the DEIS, the Millennium Longview Coal Terminal would cause or result in a 25 to 55 percent increase in deep-draft vessel transits along the lower Columbia River federal navigation channel, with corresponding increased risk of vessel incidents, potential spills, and impacts or damages.

Coal dust includes visible fractions (coal dust or smoke) and invisible fractions. Both contain persistent, toxic pollutants that pose a risk to both human and ecosystem health (e.g., heavy metals, including mercury; polycyclic aromatic hydrocarbons). Smaller coal dust particles, including those present in the invisible fraction, have a comparatively higher surface area, are more likely to travel significant distances before deposition, and are more susceptible to physical and chemical degradation and leaching.

The Service believes that the Millennium Longview Coal Terminal will cause or result in significant coal dust deposition along the rail transport corridor. The Service expects that the proposed action will measurably increase toxic pollutant concentrations in soils, sediments, and water, and will very likely result in exposures, potential toxic effects, and impacts to the Service’s trust resources.

The Applicant and state and federal leads have failed to identify mitigation measures that would adequately avoid these significant impacts. The Applicant and SEPA co-leads have stated, “Coal dust [will] become airborne from rail cars ... [but] the rail cars [will] not be covered” (Cowlitz County and DOE 2016, Coal Dust Fact Sheet). Based on the information provided, the proposed mitigation measures (coal pile shaping and topper agents) do not appear to adequately address these significant impacts. The FEIS should analyze and address the use of covered rail cars as a reasonable measure to avoid and minimize significant adverse impacts to human and ecosystem health. The Department recommends that the FEIS more completely address foreseeable adverse

impacts along the entire rail transport corridor, including the potential impacts of coal dust deposition.

*Rail Safety* – The DEIS assesses and describes foreseeable impacts to rail safety (Cowlitz County and DOE 2016, Summary, pp. S-30 through S-32, S-42; Corps of Engineers and DOE 2016c):

- “The proposed action would increase the potential for train accidents ... by approximately 22 percent in Cowlitz County and Washington State.”
- “Because the frequency of train traffic on BNSF routes would increase ... the probability of an increase in emergency response time ... would also increase [at all crossings statewide] ... crossings would be blocked more frequently.”
- “The proposed action [would] result in a significant adverse environmental impact on rail safety in Cowlitz County and Washington State.”

The Millennium Longview Coal Terminal would generate significant additional rail traffic. The rail transport corridor includes more than 200 at-grade crossings, including numerous under-protected crossings (USFWS 2016c). Risk of derailments or other train accidents, and resulting impacts and damages, would be greater at hundreds of known and unknown sites with conditions that already contribute to existing elevated safety risk. Increased rail traffic, resulting disruptions to community resources and access, and increased risk of derailments or other train accidents (e.g., collisions at crossings) represent significant adverse impacts. Geographic Response Plans have not been established for large areas of the rail transport corridor, and a survey of first responders in Washington finds that most fire/emergency departments and agencies report inadequate training, materials, and other resources (USFWS 2016c). The FEIS should identify measures that will adequately mitigate these significant adverse impacts.

*Vessel Transportation* – The DEIS assesses and describes foreseeable impacts to vessel transportation (Cowlitz County and DOE 2016, Summary, pp. S-32 through S-35, S-42; Corps of Engineers and DOE 2016c):

- “An increase in vessel traffic [would] increase the risk of vessel-related emergencies, such as fire or vessel allusion.”
- “Increased vessel traffic [would] increase the risk of vessel incidents such as allisions, collisions, groundings, and fire ... [Our] analysis estimated that the proposed action [would] increase the frequency of collisions, groundings, and fires by approximately 1.5 incidents per year.”
- “If an incident occurred during vessel transportation ... the impacts could be significant, depending on the nature and location of the incident, the weather conditions at the time, and whether any fuel [or cargo] is discharged ... Although the likelihood of a serious incident is very low, there are no mitigation measures that can completely eliminate the possibility of an incident or the resulting impacts.”

The Service agrees that some incident scenarios, resulting impacts, and damages are likely to occur over the functional life of the proposed facility (e.g., approximately 30 years). The Service

also agrees that large or very large incidents are less likely to occur, but would result in severe impacts and damages to fish, wildlife, and tribal trust resources. The FEIS should identify measures that will adequately mitigate these significant adverse impacts. The Department recommends that the FEIS consider and explain why the Preferred Alternative is a better choice than other alternatives, including the No-Action Alternative.

*Air Quality (Including Coal Dust)* – The DEIS assesses and describes foreseeable impacts to air quality (Cowlitz County and DOE 2016, Summary, pp. S-35 through S-37; Corps of Engineers and DOE 2016c):

- “Statewide, the largest increase in locomotive emissions for any one pollutant would be for carbon monoxide at 38 percent, followed by nitrogen oxides with a 15 percent increase ... For commercial marine vessels, the relative increase would be a maximum increase of 12 percent for [volatile organic] emissions and just under 11 percent for carbon monoxide emissions.”
- “During rail transit, wind and air moving over the train [will] blow coal dust off the rail cars and disperse it into the air ... [and to] the ground ... Coal dust would also be generated and dispersed ... during coal stockpiling and handling activities in the project area.”
- “There are no federal or state guidelines or standards that identify acceptable levels of [coal] dust deposition ... A reference standard [is] commonly cited, [based] on ... a New Zealand Ministry of Environment study ... This Draft EIS uses [the reference standard] to identify a threshold for nuisance-level dust deposition ... coal dust that affects the aesthetics, look, or cleanliness of surfaces ... not the health of humans [or] the environment.”
- “[Our] study found the proposed action would result in coal dust [deposition] ... along the rail lines ... While the average and maximum deposition ... was estimated to [exceed] the nuisance thresholds at [some locations], no state or federal standards apply ... This would be an unavoidable but not significant [(or insignificant)] impact.”

Locomotive emissions, including diesel particulate matter, and coal dust could have serious human health implications for affected communities along the rail transport corridor. The Applicant and state and federal leads have failed to identify mitigation measures that would adequately avoid these significant adverse impacts. The Applicant and state and federal leads have offered no explanation as to why covered rail cars have not been considered and adopted as a reasonable measure to avoid and minimize significant adverse impacts to human and ecosystem health. The FEIS should analyze and address the use of covered rail cars as a reasonable measure to avoid and minimize significant adverse impacts to human and ecosystem health.

*GHG Emissions and Climate Change* – The DEIS assesses and describes foreseeable impacts to GHG emissions and climate change (Cowlitz County and DOE 2016, Summary, pp. S-37 through S-39, S-43; Corps of Engineers and DOE 2016c):

- “GHG emissions were estimated ... in Cowlitz County, as well as ... outside Cowlitz County, including rail and vessel transportation.”
- “GHG emissions ... attributable to the proposed action would be driven primarily by coal combustion in Asia and the United States ... Under the preferred 2015 Energy Policy scenario, the change in emissions, or the net annual emissions, from the proposed action in 2028 would be 3.2 million metric tons of CO<sub>2</sub> (equivalent) ... This is equivalent to adding about 672,100 passenger cars on the road each year.”
- “The total net emissions for the preferred 2015 Energy Policy scenario from 2018 to 2038 would be 37.6 million metric tons of CO<sub>2</sub> (equivalent) ... The total net emissions are the sum of emissions ... compared to a no-action scenario in which the proposed action would not be not constructed ... This would exceed various thresholds that are proposed in federal and state regulations and guidance.”
- “The climate change impacts resulting from this increase ... would persist for a long period of time, beyond the analysis period, and would be considered permanent ... The climate change impacts, while global in nature, would affect Washington State ... Based on these considerations, emissions attributable to ... the proposed action ... are considered adverse and significant.”

GHG emissions contribute to observed trends toward increasing global average sea temperatures, ocean acidification, and other disruptions of the global climate system. These trends are a threat to ecosystem function, including aquatic food webs. These trends are a threat to important Tribal, commercial, and recreational fisheries, and to all of the Service’s fish and wildlife trust resources. Content included in the SEPA DEIS indicates that life-cycle GHG emissions resulting directly and indirectly from the proposed action will exceed 37.6 million metric tons of CO<sub>2</sub>. The Applicant and state and federal leads have failed to identify mitigation measures that would meaningfully avoid or reduce these significant adverse impacts.

The Service concludes that the Millennium Longview Coal Terminal is likely to have unavoidable and significant adverse impacts to air, water, and sediment quality. The proposed action would emit, directly, indirectly, and cumulatively, large quantities of GHG emissions and toxic air pollutants. These emissions could threaten the quality and function of fish and wildlife habitats along the middle and lower Columbia River, and beyond. For these reasons, the Department supports the selection of the No-Action Alternative.

*Fish and Wildlife* – The DEIS assesses and describes foreseeable direct impacts to fish, wildlife, and their habitats resulting from construction of the proposed terminal (Corps of Engineers and DOE 2016a,b,c). Construction activities will result in unavoidable “take” under the ESA [Sections 3(19) and 9(a)(1)]. Foreseeable direct impacts include permanent adverse effects to designated critical habitat for numerous ESA-listed fish species, including Coastal/lower Columbia River bull trout. The proposed marine terminal facilities, berthing area, and dredge prism would permanently degrade more than 50 acres of critically important migratory habitat. The FEIS should include a mitigation plan which meaningfully offsets and/or mitigates for the foreseeable permanent losses of habitat function. The FEIS should include a mitigation plan which offsets and/or mitigates for unavoidable impacts to Corps-regulated aquatic resources,

including the permanent loss of approximately 30 acres of wetlands and 50 acres of in-water habitat.

The DEIS assesses and describes foreseeable direct and indirect impacts to fish, wildlife, and their habitats resulting from operations of the proposed terminal (Cowlitz County and DOE 2016, Summary, pp. S-25 through S-28; Corps of Engineers and DOE 2016c):

- “Increases in vessel traffic [would] increase the risk of fish stranding from vessel wakes.”
- “Routine operations ... could result in spills or leaks of hazardous materials from vehicles, trains, or equipment ... Contaminants could affect terrestrial habitat and water quality, thus, degrading aquatic habitat in the Columbia River.”

The Applicant and state and federal leads have acknowledged potential direct impacts to fish, wildlife, and their habitats, including those that would result from increased marine vessel traffic (e.g., wake stranding of salmonids). The Applicant and state and federal leads have failed to identify mitigation measures that would adequately avoid significant impacts resulting from wake stranding along the marine vessel transport corridor. The DEIS also acknowledges that vessels pose a risk of introducing nonnative and invasive species, and that ballast water exchange practices and requirements do not fully mitigate those risks.

Locomotive emissions and coal dust are likely to accumulate in soils, sediments, and water, and may thereby result in measurable indirect impacts and damage to fish and wildlife trust resources. Spills and resulting adverse impacts along the rail and marine vessel transport corridors could result in “take” under the ESA [Sections 3(19) and 9(a)(1)] and/or adversely affect designated critical habitat, including critical habitat which has been designated by the Service for bull trout and by the National Marine Fisheries Service for numerous salmon and steelhead stocks (or Evolutionarily Significant Units). The FEIS should identify measures that will adequately mitigate all foreseeable adverse impacts to fish, wildlife, and their habitats.

The Service is aware that communities and a concerned public throughout the study area, including treaty tribes and tribal organizations, have voiced concerns regarding transport safety, security, readiness, response, and inherent vulnerability along the transportation corridors to and from the proposed Millennium Longview Coal Terminal. Cost-benefit analyses prepared in support of coal- and crude-by-rail proposals should acknowledge or consider significant impacts, damages, and costs. Otherwise, these omissions are a significant concern to the Service. The Service believes that failure to account for externalities, including social and environmental impacts and damages, results in findings that are skewed and incomplete.

There is a strong emerging State and regional consensus that coal- and crude-by-rail proposals pose unacceptable risks, and that associated costs and damages may exceed the economic benefits that accrue to local communities and the State. The state and federal leads should broaden their consideration of social and environmental factors where possible, and should monetize and provide to the public a thorough and comprehensive accounting of all the foreseeable impacts, costs, and damages that are likely to result from the Millennium Longview Coal Terminal. The FEIS should analyze and address all of the action’s foreseeable adverse impacts, costs, and damages, whether social or environmental. The FEIS should consider and

explain why the Preferred Alternative is a better choice than other alternatives, including the No-Action Alternative.

Based on the information provided in the DEIS, it appears that the Millennium Longview Coal Terminal would have unavoidable and significant adverse impacts, and would damage fish, wildlife, and tribal trust resources. Therefore, the Department supports the selection of the No-Action Alternative.

We appreciate the opportunity to review and offer comments on the DEIS. For additional information, clarification, or consultation regarding these comments or the NEPA process, please contact Ryan McReynolds, U.S. Fish and Wildlife, at [ryan\\_mcreynolds@fws.gov](mailto:ryan_mcreynolds@fws.gov).

If you have any other questions or concerns, please feel free to contact me at (503) 326-2489.

Sincerely,

A handwritten signature in black ink that reads "Allison O'Brien". The signature is written in a cursive, flowing style.

Allison O'Brien  
Regional Environmental Officer

## Sources Cited

- U.S. Army Corps of Engineers and Washington State Department of Ecology (Corps of Engineers and DOE). 2016a. Joint Public Notice – Application for Department of the Army Permit and Washington Department of Ecology Water Quality Certification, and Release of NEPA Draft Environmental Impact Statement (Millennium Bulk Terminals– Longview, LLC; Reference No. NWS-2010-1225). Public Notice Date: September 30, 2016. Expiration Date: November 29, 2016. 5pp., plus enclosures.
- U.S. Army Corps of Engineers and Washington State Department of Ecology (Corps of Engineers and DOE). 2016b. National Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview (September 30, 2016), Executive Summary. Available On-Line at <<http://www.millenniumbulkeiswa.gov/nepa-draft-eis.html>>; Accessed 11/14/2016.
- U.S. Army Corps of Engineers and Washington State Department of Ecology (Corps of Engineers and DOE). 2016c. National Environmental Policy Act Draft Environmental Impact Statement for Millennium Bulk Terminals – Longview (September 30, 2016), Cumulative Impacts. Available On-Line at <<http://www.millenniumbulkeiswa.gov/nepa-draft-eis.html>>; Accessed 11/14/2016.
- Cowlitz County and the Washington State Department of Ecology (Cowlitz County and DOE). 2016. State Environmental Policy Act Draft Environmental Impact Statement for the Millennium Bulk Terminals – Longview Project (April 2016). Available On-Line at <<http://www.millenniumbulkeiswa.gov>>; Accessed 6/1/2016.
- Cowlitz County and the Washington State Department of Ecology (Cowlitz County and DOE). 2014. State Environmental Policy Act Draft Environmental Impact Statement, Scoping Summary Report. Appendix J *In* Cowlitz County and the Washington State Department of Ecology (Cowlitz County and DOE). 2016. State Environmental Policy Act Draft Environmental Impact Statement for the Millennium Bulk Terminals – Longview Project (April 2016). Available On-Line at <[http://www.millenniumbulkeiswa.gov/assets/mbtl\\_sepa\\_deis\\_appendix-j\\_scopingsummaryreport.pdf](http://www.millenniumbulkeiswa.gov/assets/mbtl_sepa_deis_appendix-j_scopingsummaryreport.pdf)>; Accessed 6/1/2016.
- Cowlitz Indian Tribe. 2013. Letter to Colonel Bruce A. Estok, Seattle District Commander, U.S. Army Corps of Engineers – Scoping Comments for Millennium Bulk Terminals Longview, LLC (MBTL) Project NEPA/SEPA Environmental Impact Statement. November 18, 2013. 3pp.
- Cowlitz Indian Tribe. 2016. Letter to ICF International – Comments Regarding the Draft Environmental Impact Statement Concerning the Proposed Millennium Bulk Terminals – Longview. June 13, 2016. 20pp.
- The Oregonian / Oregon Live. 2016a. Days after oil train derailment, normal seems far away in scenic Mosier. [By Carli Brosseau.] Available On-Line at <[http://www.oregonlive.com/pacific-northwest-news/index.ssf/2016/06/days\\_after\\_oil\\_train\\_derailmen.html](http://www.oregonlive.com/pacific-northwest-news/index.ssf/2016/06/days_after_oil_train_derailmen.html)>; Accessed 6/8/2016.

- The Oregonian / Oregon Live. 2016b. Tribes face some of greatest risks from oil train wrecks in Columbia River Gorge, leaders say. [By Molly Harbarger.] Available On-Line at <[http://www.oregonlive.com/politics/index.ssf/2016/06/tribes\\_face\\_some\\_of\\_greatest\\_r.html](http://www.oregonlive.com/politics/index.ssf/2016/06/tribes_face_some_of_greatest_r.html)>; Accessed 6/8/2016.
- U.S. Fish and Wildlife Service. 2016a. Letter to ICF International, Subject: Public Notice and Draft Environmental Impact Statement for Millennium Bulk Terminals Longview Coal Export Terminal. Washington Fish and Wildlife Office, Lacey, Washington. June 13, 2016. 10pp.
- U.S. Fish and Wildlife Service. 2016b (January 20, 2016). Native American Policy – Working with Native American Tribes. 20pp.
- U.S. Fish and Wildlife Service. 2016c. Letter to the State of Washington Energy Facility Site Evaluation Council, Subject: Public Notice and Draft Environmental Impact Statement for the Tesoro Savage Vancouver Energy Distribution Terminal Facility. Washington Fish and Wildlife Office, Lacey, Washington. January 22, 2016. 7pp.
- U.S. Department of the Interior and U.S. Department of Commerce. 1997 (June 5, 1997). Secretarial Order 3206. 14pp.