



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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November 29, 2016

Colonel John G. Buck  
U.S. Army Corps of Engineers, Seattle District  
PO Box 3755  
Seattle, WA 98124-3755

**RE: Millennium Bulk Terminals – Longview Draft Environmental Impact Statement  
Comments, Reference No.: NWS-2010-1225**

Dear Colonel Buck:

Thank you for the opportunity to comment on the U. S. Army Corps of Engineers' (the Corps) Draft Environmental Impact Statement (EIS) for the proposed Millennium Bulk Terminals – Longview (MBTL) proposal. This project proposes to construct and operate a coal export terminal on 190 acres adjacent to the Columbia River near Longview, Washington.

The project at full build-out would receive eight unit trains per day, loaded with coal, from mines in Montana, Wyoming, Colorado, and Utah. The project would also send eight empty unit trains, per day, back to the coal mines of origin. At capacity, the project would annually export 44 million metric tons of coal to the Pacific Rim for energy combustion. The proposal would require 1,680 vessel trips per year on the Columbia River. Two new docks would stretch 2,300 feet along the shoreline and an initial 49 acres of riverbed would be removed by dredging. Over 24 acres of wetlands would be affected. Access to 20 tribal fishing sites in Washington along the Columbia River would be impacted because of increased rail traffic. Terminal construction, operations, and increased vessel traffic would impact habitat of federally listed species. This is a complex project with significant potential impacts.

Federal environmental reviews, such as the one done by the Corps, must follow the National Environmental Policy Act (NEPA). This process requires that potential direct and indirect impacts resulting from a proposal be identified and analyzed. As you know, the Department of Ecology (Ecology), with our co-lead partner Cowlitz County, are separately studying the MBTL proposal, pursuant to Washington's State Environmental Policy Act (SEPA). SEPA similarly requires that potential direct and indirect impacts be identified and analyzed. The SEPA study – unlike the NEPA review – analyzes a broader and more appropriate scope of impacts that would happen beyond the project site, because impacts would occur beyond the Longview area.

Since 2013, when the federal and local environmental review processes were initiated for this proposal, the agency partners have worked together on scoping, analyzing issues and preparing the two separate studies. I want to emphasize appreciation for the ongoing coordination between the teams conducting the NEPA and SEPA reviews. This coordination benefits the public and the applicant.



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However, during this process, Ecology has been transparent with our concern about the narrow NEPA scope of study; this comment letter focuses on that concern. Since 2011, Washington leaders have consistently communicated strong interest to federal agencies that NEPA environmental reviews should consider both direct and indirect impacts of projects that could potentially cause significant adverse environmental impacts in Washington. Our state leaders have asked the Bureau of Land Management, the Surface Transportation Board and the Army Corps of Engineers to follow NEPA's existing requirements for analyzing direct and indirect effects proximately caused by a proposal.

Ecology was encouraged by the Surface Transportation Board's assessment of the proposed Tongue River Railroad Company project in Montana, released in 2015. In particular, the Surface Transportation Board assessed indirect and cumulative impacts upstream and downstream of the project, an approach matching guidance from the federal Council on Environmental Quality. The Surface Transportation Board's analyses provided the public and applicant a more complete understanding of potential impacts. The Surface Transportation Board evaluated impacts from transportation, coal dust, and greenhouse gas emissions. Ecology encourages the Corps to follow the example of the Surface Transportation Board and broaden the NEPA review to include the indirect and cumulative impacts upstream and downstream of the MBTL proposal.

The scoping process and review period for the SEPA Draft EIS garnered unprecedented interest. Washington's local communities, state, and tribal leaders, and other interested parties are seeking answers regarding how a complex project of this large scale will affect them. As you know, the SEPA Draft EIS analyzes and discloses the direct and indirect impacts inside and outside of Washington borders. This information is available for the Corps to review and incorporate into the NEPA Final EIS. For your convenience, this letter includes an electronic copy of the SEPA Draft EIS provided for your consideration and as part of our comment on the NEPA Draft EIS.

NEPA clearly states the purpose of an EIS is to provide a "full and fair discussion of significant environmental impacts." This has not been done in the NEPA Draft EIS due to its limited scope, and Ecology requests the Corps revise the federal EIS to adequately address indirect effects.

In closing, I again express my appreciation for the ongoing coordination between the federal, local, and state teams preparing these reviews.

Sincerely,



Maia D. Bellon  
Director

cc: Mike Karnofski, Cowlitz County Commissioner  
Danette Guy, Project Manager, U.S. Army Corps of Engineers

Enclosure