



Columbia River Steamship Operators' Association, Inc.

June 8, 2016

Millennium Bulk Terminal EIS
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

Re: Comments of the Columbia River Steamship Operators' Association, Inc. in Response to the DEIS for the Millennium Bulk Terminals-Longview LLC Project

To Whom it May Concern:

The Columbia River Steamship Operators' Association, Inc. (CRSOA), appreciates the opportunity to comment on the SEPA Draft Environmental Impact Statement for the Millennium Bulk Terminals-Longview LLC (Millennium Bulk) project. Established in 1922, the CRSOA consists of members representing ship owners, operators, agents, tow companies and bunkering companies along the Oregon Coast and Columbia/Willamette River Systems. The mission of the CRSOA is to facilitate trade, provide business leadership, exercise principles of environmental stewardship, serve as an industry focal point, and promote operating policies and practices that are safe, reliable, efficient, and cost effective. We believe that Millennium Bulk can safely and efficiently construct and operate the proposed coal export facility and shipping terminal.

Increased vessel traffic is identified as an "unavoidable and significant adverse environmental Impact" due to a potential incident, such as a collision (S.7.7, pg S-42). Recently completed channel deepening of the Columbia River was intended to increase vessel traffic while investments in training and navigational technology by the CRSOA, pilots, and the tug and towboat industry have increased the safety of vessel operations and movements (5.4.4.2, pg 5.4-20). CRSOA is concerned that increased vessel activity is considered a negative impact. 1,377 ships called the Columbia River in 2015, well below the recent high of 2,283, recorded in 2000 (Merchants Exchange). Increased vessel traffic resulting from the proposed project is projected to be below this recent high and unlikely to result in vessel traffic congestion. The Columbia River has the capacity for growth. Not only is the river not being utilized to capacity, but the federal navigation channel's designated purpose is commercial marine traffic and transportation (33 CFR §328.3(a)(1); 40 CFR §230.3(s)(1)). In 2010, the Columbia River was officially designated by the U.S. Department of Transportation and the Maritime Administration as a Marine Highway (M-84)– with a vision to 'ensure that reliable, regularly scheduled, competitive, and sustainable services are a routine choice for shippers' (46 CFR §393.3). Increased vessel activity in the Columbia River is necessary to support continued investments by existing and planned facilities and the maritime service industry that supports them.

The inclusion of alleged greenhouse gas emissions outside of Washington State is both inappropriate and sets a dangerous precedent with respect to any planned expansion of, or newly proposed maritime facility that handles products moving across state and international boundaries (5.8.1.4, pg 5.8-5). The maritime industry that supports Washington state ports continues to make significant investments in improving efficiency and safety with the highest attention to environmental compliance and is concerned about practices that will delay or potentially prevent new maritime terminal developments.



Columbia River Steamship Operators' Association, Inc.

CRSOA supports a timely and independent review process. We find this to be paramount to ensuring that other marine terminal developments will continue to consider our region for development and not look to other states and/or countries that are able to provide a more reasonable and certain permitting environment.

CRSOA was one of the founders of the Maritime Fire and Safety Association (MFSA) in 1984 and played a major role in expanding MFSA to include oil and hazardous material spill prevention, response, and mitigation in the early 1990s. We continue to support the MFSA as they provide safe, environmentally responsible, and cost effective response services to commercial vessels in the Columbia Willamette River Marine Transportation System (5.4.4.5, pg 5.4-33; www.mfsa.com). CRSOA has been an industry leader in assisting the state agencies in Oregon and Washington with developing and funding innovative and highly successful spill prevention and response programs.

CRSOA partnered with the Columbia River Pilots and the John A. Volpe National Transportation Systems Center to develop Transview 32 (TV32), a Vessel Traffic Information System (VTIS) for the Columbia River. Using TV32, vessels are able to continually broadcast navigation information to allow users to monitor vessel traffic, manage anchorages, and manage navigation. TV32 enhances the safety of navigation on our river system, thereby increasing transportation system efficiency while decreasing critical encounter situations and the probability of a marine casualty resulting in environmental damage (5.4.4.2, pg 5.4-23). CRSOA has reflected in these actions, a long time commitment to safety and environmental stewardship.

The state of Washington 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 has put forth a concerted effort to assure that environmental protections are put in place for its proposed import/export terminal. The Millennium Bulk project would be a valuable addition to our regional economy, create jobs, and be an asset to the surrounding communities and the economic outlook of our nation as a whole.

We thank you again for the opportunity to comment.

Respectfully,

Kate Mickelson
Executive Director