



THE COLUMBIA RIVER BAR PILOTS
Providing Safe Passage Since 1846



June 9, 2016

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

Re: Millennium Bulk Terminals – Longview project DEIS

Dear Sir or Madam:

This letter provides the comments of the Columbia River Bar Pilots on the Draft Environmental Impact Statement for the Proposed Millennium Bulk Terminals – Longview project. The Columbia River Bar Pilots are an organization of 17 state-licensed pilots who are responsible for piloting ocean-going vessels transiting the Columbia River Bar pilotage ground that covers a distance of approximately 25 miles from the Columbia River entrance in the Pacific Ocean to Tongue Point just east of Astoria. The history of the Bar Pilots dates back more than 200 years. Bar Pilots were among the first professionals of any kind to be licensed by Oregon's territorial government more than a decade before statehood in 1859. Historically, the Bar Pilots have played a key role in the development of commerce on the Columbia/Snake River navigational system and have an enviable record of success in safely guiding ships through a river entrance that is universally acknowledged as one of the most dynamic and dangerous in the world.

The Bar Pilots' enviable safety record is a function of the group's tradition and dedication to stringent licensing requirements. While a common requirement in other parts of the world, the Columbia River Bar is the only pilotage ground in the United States where applicants must have a minimum of two years' sea time serving as a ship's master or captain while operating under the unlimited license (any ocean and any ton vessel). This licensing requirement has been a matter of regulation since 1940. As a result, the Bar Pilots are drawn from throughout the United States after having graduated from a U.S. maritime academy and serving 15 to 25 years at sea, working up from an officer position to master.

In addition to stringent licensing requirements, the Bar Pilots have been leaders in adopting new technology to enhance navigational safety. As the size of the average cargo ship more than doubled between the 1960s and the 1990s, the Bar Pilots pioneered the first use of a daughter boat boarding and disembarking system in the Ocean. The helicopter began operations in August 1999 and

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has safely transferred over 35,000 Bar Pilots to and from vessels in the Pacific Ocean for over 18 years with one minor injury accident. The leadership of the Columbia River Bar Pilots in successfully introducing helicopter operations in the United States was recognized by *Professional Mariner* magazine with the award of its prestigious Plimsoll Award recognizing leadership in maritime safety in 2003. Beginning in 2000, the Bar Pilots also modernized their pilot boats to fast, highly maneuverable, jet-powered vessels that started a worldwide trend in pilot boat technology that increases navigational safety and efficiency.

With respect to the draft DEIS, the Bar Pilots has two comments concerning the capacity of the Columbia River navigational system and congestion. Those comments are set out below.

The DEIS in Chapter 5 states that the proposed project would generate a 44% increase over exiting traffic levels. In fact, the proposed project will be served primarily by Handymax and Panamax vessels, which have been calling in the Columbia River for decades and which account for a majority of the bulk carriers taking on grain cargoes on the Columbia River. The Bar Pilots are confident that the Columbia River system can easily accommodate an additional 840 cargo vessels per year. During the six-year period of 1995- 2000, the number of inbound vessels averaged over 2,000 per year. In contrast, the five-year time frame of 2009-2013 has averaged 1475 vessels annually.

It should also be emphasized that the lower Mississippi River system accommodates approximately four times the volume of the volume experienced in the Columbia River. From a navigational safety standpoint, the highly regulated dual pilotage system on the Columbia River, which will require both a river pilot for the transit from Vancouver to Astoria and then a Bar Pilot for the transit from Astoria across the Bar to the Pacific Ocean, has more than sufficient capacity to safely accommodate the additional traffic from the proposed project as demonstrated by traffic and accident statistics over many decades.

We appreciate the opportunity to present these comments.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'D. S. J.', with a stylized flourish at the end.

Captain Dan Jordan

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