



June 9, 2016

Cowlitz County  
Department of Building and Planning  
207 Fourth Avenue North  
Kelso, WA 98626

Washington Department of Ecology  
Southwest Regional Office  
P.O. Box 47775  
Olympia, WA 98504

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

Dear Cowlitz County and Washington Department of Ecology:

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 is a marine transportation and terminal services company based in Vancouver, Washington. Tidewater has been in business since 1932, employs approximately 300 people, and operates a fleet of 18 towboats, 170 barges and five marine terminals on the Columbia and Snake River system.

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

Chapter 5 - Operations, Section 5.4 – Vessel Transportation

*Subsection 5.4.3.1 – Information Sources (pages 3-4)*

We find no record either in this subsection or anywhere else in the DEIS that mentions that Columbia River towing operators such as Tidewater were directly contacted to collect vessel transportation information. We suggest contacting Tidewater and other the towing operators mentioned in the DEIS due to the fact that they been safely operating on the Columbia River for many years. Furthermore, our industry's incident statistics and safety record shows that the towing industry in Washington has one of the best programs for moving commodities in the nation.

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 spill into the Columbia River system. We did not find mention of our capabilities in the DEIS, so wanted to include the following information:

Tidewater is a Primary Response Contractor for Washington State's Department of Ecology and is able to respond to a spill to 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 a spill into 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**

Finally, we believe that the aforementioned information is relevant to the DEIS when making conclusions about the “Unavoidable and Significant Adverse Environmental Impacts” for vessel transportation.

*Subsection 5.4.8 - Unavoidable and Significant Adverse Environmental Impacts (page 47)*

The conclusions in this subsection were formed without all of the pertinent vessel transportation information. We believe that if you had involved the Columbia River’s towing operators to understand their Best-Of-Class operations and emergency spill response capabilities, that classifying vessel incidents as having “Significant Adverse Environmental Impacts” would not be an appropriate conclusion.

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 well-being of jobs in Washington and throughout the Pacific Northwest.

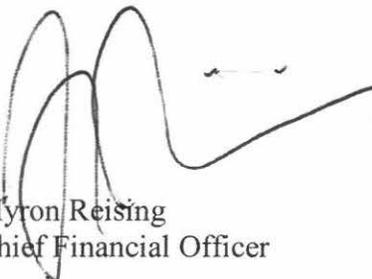
In conclusion, the proposed Millennium Bulk Terminal project offers an opportunity to expand our ports, ensure that jobs are created and preserved, stimulate growth in the local and regional economy and provide our state with a world class project that will ensure environmental standards are maintained. 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



Myron Reising  
Chief Financial Officer



**TIDEWATER**  
TRANSPORTATION & TERMINALS

Bruce Reed  
Chief Operating Officer

Andy Stephens  
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William H. Collins  
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