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Elaine Placido, Director, Building and Planning, Cowlitz County
Sally Toteff, Director, Southwest Regional Office, Washington State Dept. of Ecology
MBTL SEPA Draft EIS
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

(Submitted Electronically <https://public.commentworks.com/cwx/mbtldeiscommentform/>)

Dear Ms. Placido and Ms. Toteff,

The USDA Forest Service, Columbia River Gorge National Scenic Area provides these comments on the Draft Environmental Impact Statement (DEIS) for the coal export terminal proposed by Millennium Bulk Terminals – Longview, LLC. The location of the proposed terminal is the site of the former Reynolds Aluminum smelter, on the shore of the Columbia River in Cowlitz County, Washington. Coal would be delivered to the terminal by rail, with loaded 125-car unit trains of coal arriving via the Burlington Northern-Santa-Fe (BNSF) Pasco-Vancouver route along the Washington shore of the Columbia River, and the Union Pacific (UP) rail lines running along the Oregon shore of the Columbia River. If approved and constructed, the terminal would increase rail traffic through the Columbia River Gorge by eight loaded unit trails of coal per day. Empty UP trains may make a return trip through the Gorge. We are concerned about the impacts of project-related increases in rail traffic through the Gorge.

The Columbia River Gorge National Scenic Area (CRGNSA) was created in 1986 by an act of the U.S. Congress. The purposes of the Act are: (1) to establish a national scenic area to protect and provide for the enhancement of the scenic, cultural, recreational, and natural resources of the Columbia River Gorge; and (2) to protect and support the economy of the Columbia River Gorge area by encouraging growth to occur in existing urban areas and by allowing future economic development in a manner that is consistent with paragraph (1) (Pub. L. 99-663, Sec. 3, Nov. 17, 1986, 100 Stat. 4276). In establishing the National Scenic Area, Congress recognized the national significance of the unique values and resources in the Columbia Gorge, and designated them for long-term protection and enhancement. Given the importance of this unique context, it is essential that the Millennium proposal be fully evaluated for impacts to the resources and economies the Scenic Area Act is intended to protect.

The CRGNSA runs along both the Washington and Oregon sides of the Columbia River, spanning approximately 85 miles from Washougal to Wishram in Washington, and Troutdale to The Dalles in Oregon. The CRGNSA encompasses 292,500 acres, and contains thirteen designated urban areas and numerous other communities. Land ownership is mixed, and includes



federal, state, county, tribal, private and other interests. Land use is also mixed, with an overall rural character. Development and population centers occur primarily along the river corridor. Recreation, tourism, forestry, and local agriculture are important components of the gorge economy.

The CRGNSA is an international tourist and recreation destination, renowned for its scenic beauty; its wide diversity of intact natural habitats; plant and animal species, including ESA-listed salmon; and its rich cultural history. Millions of visitors - local, national, and international - visit the CRGNSA every year. The National Scenic Area Act assigned the U.S. Forest Service and the Columbia River Gorge Commission responsibility for management of lands and resources within the Scenic Area. The U.S. Forest Service is concerned about the project's potential impacts to the scenic, natural, cultural, and recreational resources in the Gorge; to the economies of Gorge communities; and to the treaty rights of the Columbia River Treaty Tribes.

In November of 2013 our office submitted a comment letter during the scoping period for the Millennium Bulk Terminal project. We requested that the DEIS take into consideration the potential impacts of the proposal on the Columbia River Gorge National Scenic Area, particularly those impacts associated with the project-related increase in train traffic through the Gorge. Among our concerns were the potential for an increase in rail-related fire starts and resultant wildfires; impacts to air and water quality; the establishment and spread of new populations of invasive species; and noise impacts associated with increased rail traffic. While the DEIS does generally consider some of these topics, nowhere does it specifically address the project's potential effects within the uniquely sensitive context of the CRGNSA.

The Columbia River Gorge is a major regional transportation corridor for river, motor vehicle, and railroad traffic. On the Washington side of the Columbia River, the Burlington Northern-Santa Fe (BNSF) rail line runs the length of the Scenic Area, paralleling both State Route 14 (SR 14) and the Columbia River shoreline. On the Oregon side, the Union Pacific Railroad (UPRR) line runs parallel to Interstate Highway 84 (I-84) and the river shore. On both sides of the Columbia, this is a narrow transportation corridor. On the Washington side, it is tightly geographically constrained by the Columbia River to the south, and by steep hills and cliffs to the north. Transportation, communities, and recreational activities are concentrated along the river corridor. The BNSF and UPRR rail lines pass directly through the gorge's major population centers, tourist attractions, and recreation areas. In addition, both UPRR and BNSF rail lines are immediately adjacent to the Columbia River in most places, and cross many major and minor tributaries.

Given the nature of this corridor, any rail incident involving a spill, fire, or explosion is likely to have notable detrimental impacts to Gorge resources, communities, public safety, and to the overall economy of the gorge. Current preparedness levels across the entire rail corridor are not adequate for response to any other than a very small incident. Emergency response within the Scenic Area corridor is logistically extremely challenging. In addition to the lack of local response capacity, limited road access from the north and south and the likelihood that an incident along either the UPRR or the BNSF line would block and cause closures, backups and delays on I-84 or SR 14 or both would further hinder response and evacuation efforts. Depending on the type and scale of the incident itself, the emergency response and subsequent clean-up activities also have the potential to significantly impact treaty rights, damage or destroy irreplaceable cultural and historic resources, and adversely impact natural resources.

The gorge is well known for its strong prevailing winds. Increased rail traffic would require increased routine rail maintenance, including rail grinding and other activities that produce sparks. This increase in rail maintenance carries with it the potential for increased fire starts within the Scenic Area and across the length of the rail corridor. Any rail incident involving fire is likely to be immediately compounded by the strong winds that blow almost consistently through the gorge, and which could cause fire to spread rapidly from its point of origin. The June 3, 2016 derailment of a UPRR unit train carrying Baaken crude oil provided an important wake-up call about the potential for a disastrous rail-related incident in the Gorge. Had the typical winds been blowing that day, the fire associated with that incident would have quickly become a potentially catastrophic wildfire.

Setting aside the impacts associated with a spill, fire, explosion or other rail incident, the DEIS analysis of impacts associated with an increase in rail traffic through the Gorge does not assess the potential for impacts to the CRGNSA's unique scenic, natural, recreational and cultural resources, or the potential economic effects to gorge communities. Rail traffic can block or hinder access to popular recreation sites. It can be a deterrent to recreation and tourism-related economic activity. Rail traffic blocks scenic views of the Columbia River and the Oregon side of the Gorge from the SR 14 corridor in Washington. The DEIS acknowledges that the increase in rail traffic associated with the proposed action would exceed the capacity of the current BNSF rail infrastructure in Washington State. What additional rail infrastructure would be needed in the foreseeable future were the proposed Millennium terminal to be approved and become fully operational? How do the social and environmental effects of the proposed increase in Millennium-related rail traffic through the CRGNSA interact cumulatively with other current proposals for increased terminal capacity along the same rail lines – for instance, the proposed Tesoro-Savage petroleum terminal in Vancouver, Washington that is currently under analysis?

We request that the final DEIS for the Millennium Bulk Terminals – Longview proposal include an analysis specific to the potential impacts of the project to the resources, communities, and economy of the Columbia River Gorge National Scenic Area. The Scenic Area is unique as a congressionally designated area with a high concentration of important and sensitive scenic, natural, cultural and recreational resources and a local economy that is closely tied in with the protection and enhancement of those resources.

We urge the agencies responsible for developing this analysis to utilize information sources specific to the Gorge, to inform the analysis. Examples include Dr. Dan Jaffe's studies of coal dust deposition in the Gorge (<http://www.atmos.washington.edu/jaffegroup/modules/APOLLO/>), information available from the Columbia River Inter-Tribal Fish Commission (<http://www.critfc.org>), and Gorge-specific information from state and federal agencies involved in land and resource management in the Columbia River Gorge. Please feel free to contact my staff for additional information. Your point of contact for the USFS-CRGNSA is Natural Resource and Planning Staff Officer Robin Shoal, who can be reached at 541-308-1716, or rshoal@fs.fed.us.

Sincerely,



for LYNN BURDITT
Area Manager