

June 12, 2016

Cowlitz County Planning Department  
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Director of Planning and Building  
Kelso, Washington

Washington Department of Ecology  
Sally Toteff  
Director Southwest Regional Office  
Lacey, Washington

**Comments on Millennium Bulk Terminals Longview SEPA EIS**

Thank you for allowing public input into the Millennium Bulk Terminal Longview - Coal Export Terminal.

I am a retired Chemical Engineer and Registered Professional Engineer with a 35 year career in the natural gas business and live in Vancouver Washington.

Below are 92 comments in 50 pages on portions of the Millennium SEPA DEIS and recommend the No Action Alternative for this proposal.

Combined with the previous submission of 13 comments my total submissions are 105.

Economics are not a part of this environmental review but coal is cheaper than dirt.

\$0.0886 per metric ton or \$10.82 per loaded rail car to be shared between Cowlitz County and the State of Washington. There is no revenue stream for the empty rail cars returning to the mine.

The Federal Government Royalty on Coal Leases is around \$1.00 per Ton and it is currently being reviewed to determine if this is a fair amount.

The Risk is greater than the Reward.

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## **Proposal**

To receive 44 Million Metric Tons of Coal from the Powder River and Uinta Basins by Rail Car and off load, Store and Load to Marine Vessels on the Columbia River for Asian Market Destinations.

### **Comments on Introductory Material**

Comment #1 - The short 45 Day Comment Period is considered extremely short for the detailed review of the 3,723 page document and additional review time is recommended. In a business environment where a maximum of 4 hours a day is typical for review of this document there are only 29 work days for the period April 29 to June 13 as there is a holiday for Memorial Day during this period . This requires an average of 129 pages a day of very complex and technical information to Read, Understand, and to formulate a Comment. If the Applicant is serious about this proposal, additional review time is recommended. Page 4

Comment #2 – The Proposal calls for 8 trains per day with 125 rail cars and total delivery of 44 Million Metric Tons Per Year to Asian Markets

From Chapter 5 Page 10 each unit train of 125 rail cars will haul 15,263 Short Tons of Coal

44 Million Metric Tons Per Year x 1.1 Metric Tons / Short Tons = 48.4 Million Short Tons Per Year

48,500,000 Short Tons Per Year / (15,263 Short Tons/ Train x 365 Days Per Year) = 8.70 Trains Per Day

This indicates the basic premise that 8 Loaded Trains Per Day is FALSE and the Actual number assuming “Perfect World Conditions” is 8.7 Trains Per Day or an increase of 0.7 Trains Minimum Per Day.

Since Rail Car Loadings are not done in “Perfect World Conditions” The reality is a minimum of 9 Trains per Day. This indicates that all calculations done in the DEIS are in error and the “No Action Alternative” is Recommended. Page 5 (Fact Sheet 1)

Comment #3 – The SEPA DEIS Is available at eight locations for public review. However, it missed the most populated Communities that will be impacted by the rail system and also the river systems. Additional copies need to be provided in Vancouver, Washington, Portland Oregon, and Astoria, Oregon.

Also beyond the local region, copies need to be provided for the major communities in Idaho, Montana, Wyoming, Colorado, and Utah. This project is a game changer on transportation in the entire Western States of the USA. Page 11 (Fact Sheet 6).

Comment #4 – The entire 3,723 page document is very challenging to find specific information to make a specific comment. An example does the DEIS adequately address rail issues in Washington forest lands to prevent, eliminate, or contain, a fire started from a passing coal train. The proposal has 730,000 rail cars trips a year going loaded from the mines to the Terminal and returning empty to the mines. Each rail car has 8 wheels resulting in 5.84 million wheels that can generate a spark to ignite a major forest fire in remote regions. Where to look for this answer is not an easy matter and results in a

question unanswered. Better search capabilities and a Master Volume I, Volume II, Volume III and Volume IV is needed. Page 12 (Fact Sheet 8)

Comment #5 – The SEPA DEIS Document is 3,723 pages and according to the SEPA Guidelines this document should be a maximum of 150 pages.

An EIS is not meant to be a huge, unwieldy document. The text of a typical EIS is intended to be only 30 to 50 pages. It is not to exceed 75 pages unless the proposal is of unusual scope or complexity, in which case it may not exceed 150 pages<sup>58</sup>. The EIS should provide information that is readable and useful for the agencies, the applicant, and interested citizens. SEPA Handbook Page 61 and WAC 197-11-425 (4)

This project is the Largest Coal Export Terminal Proposal for North America and should have a very detailed and robust DEIS, however the document is almost 25 times larger in size and is too much to comprehend in a short time period. It is also nearly 5 times larger than the large 150 Page guideline for the document only. Page 12 (Fact Sheet 8)

### **Comments on Summary Chapter 0**

Comment #6 - Separate and parallel to the environmental review process is the development of a Health Impact Assessment. Information about the Health Impact Assessment is not provided in this Draft EIS. No information is provided on the timing of the release of the Health Assessment document. Page S-2

Comment #7 - The co-lead agencies invited local agencies, state agencies, federal agencies, tribes, organizations, and members of the public to comment on the scope of the EIS during a 95-day scoping period. The scoping period began on August 16, 2013, and closed November 18, 2013. Approximately 217,500 comments were received. The SEPA DEIS has only a 45 day Comment Period and does not allow adequate review of such an important document. Page S-3

Comment #8 - The Applicant Objectives are as follows:

- **Enable western U.S. coal to compete in the Pacific international coal supply market.** The Applicant states the Proposed Action would enable western U.S. coal to compete in the Pacific international coal supply market by providing a facility designed to efficiently transport western U.S. coal from rail to ocean-going vessels. The Applicant states further development of western U.S. coalfields and the growth of Asian market demand for U.S. coal is expected to continue, and existing West Coast terminals are unavailable to support this need. According to the Applicant, to derive benefit from economies of scale, implementation of the Proposed Action would provide a coal export terminal sufficient in throughput to give U.S. coal producers the opportunity to expand their share of the international coal market.
- **Diversify Washington State's trade-based economy.** The Applicant states the Proposed Action would support the diversification of Washington State's trade-based economy by providing a new bulk commodity export terminal to accommodate the anticipated growth in demand for exporting U.S. coal. According to the Applicant, implementation of the Proposed Action would help support the state's diverse economy, which is essential for maintaining economic sustainability.
- **Reduce local unemployment.** The Applicant states the Proposed Action would help reduce unemployment in Cowlitz County by creating employment opportunities in the Longview area. The new employment opportunities would also generate needed tax revenues for local economies.

Information from the nearly 8,000 entries in the Energy Information Administration and Department of Commerce for the period 2002 through 2015 related to US Coal Exports of Steam Coal, Metallurgical Coal, and Coke.

1. USA Exports 2002 -2015 with 7,982 Load Tickets

Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	<b>427,677,338</b>	<b>\$ 25,886,132,667</b>	<b>\$60.53</b>
Metallurgical Coal	<b>605,897,755</b>	<b>\$ 70,884,352,831</b>	<b>\$116.99</b>
Coke	<b>16,955,726</b>	<b>\$ 2,272,260,263</b>	<b>\$134.01</b>

2. Pacific Ocean Exports 2002-2015 with 938 Load Tickets

Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	<b>48,962,872</b>	<b>\$ 2,238,829,386</b>	<b>\$45.73</b>
Metallurgical Coal	<b>2,001,410</b>	<b>\$ 136,589,166</b>	<b>\$68.25</b>
Coke	<b>358,137</b>	<b>\$ 37,055,593</b>	<b>\$103.47</b>

3. Seattle Washington Exports 2002-2015 with 285 Load Tickets

Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	<b>26,350,048</b>	<b>\$ 855,277,140</b>	<b>\$32.46</b>
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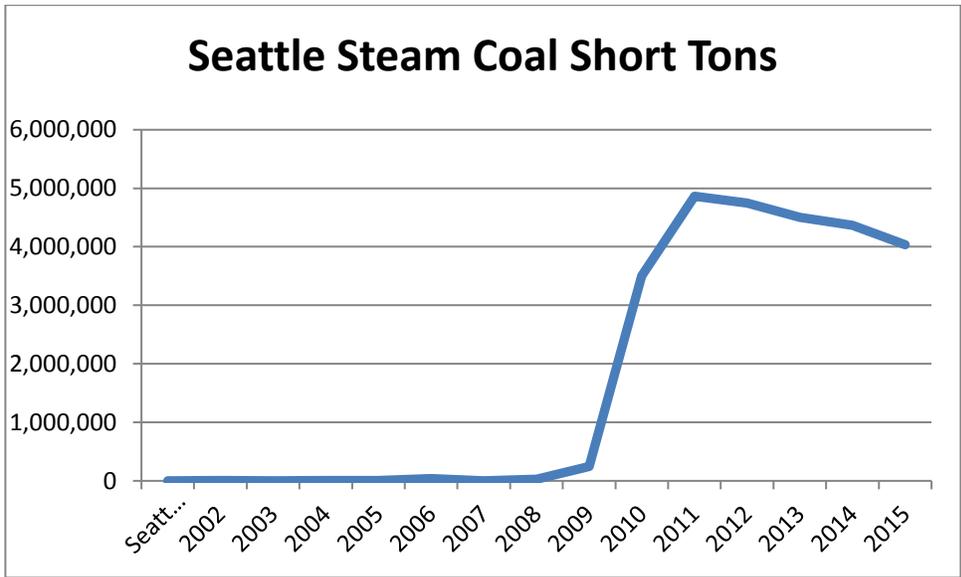
4. USA Exports 2015 Only with 599 load tickets

Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	27,951,029	\$ 1,577,475,160	\$56.44
Metallurgical Coal	46,006,859	\$ 4,108,921,314	\$89.31
Coke	856,878	\$ 197,114,970	\$230.04

5. Seattle Washington Exports 2015 Only with 60 Load Tickets

Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	4,036,724	\$ 130,764,680	\$32.39
Metallurgical Coal	0	0	0
Coke	829	\$ 616,903	\$744.15

6. Seattle Washington Steam Coal Exports by Year 2002-2015



7. Pacific Ocean Port Exports to the following 41 Countries (List Only) with the numbers and Bold from the Port of Seattle Only

<b>South Korea - 45</b>	<b>Thailand - 28</b>	Peru	<b>India - 5</b>
Brazil	<b>New Zealand - 1</b>	Pakistan	Italy
Chile	<b>Australia - 20</b>	Saudi Arabia	Oman
<b>Singapore - 23</b>	France	Philippines	Sweden
Ivory Coast	Vietnam	Kazakhstan	Greece
<b>Japan - 29</b>	El Salvador	Mexico	Belgium
<b>Taiwan - 15</b>	Russia	<b>Netherlands -1</b>	South Africa
<b>China - 25</b>	Slovenia	Guatemala	<b>Brunei -9</b>
<b>Hong Kong - 8</b>	<b>Malaysia - 24</b>	Kuwait	Bolivia
Indonesia	<b>Canada - 54</b>	Libya	United Arab
<b>Spain - 1</b>			

8. Observations by Bill Brake

- Metallurgical Coal is Top Export from USA followed by Steam Coal
- Steam Coal is Top Export from Pacific Ocean Port Cities
- Pacific Ocean Port Cities are San Diego, Los Angeles, San Francisco, Portland, Seattle and Anchorage
- Seattle Washington is over half of Steam Coal Exports from Pacific Ocean Cities
- Pacific Ocean Ports and Seattle have significantly Lower Revenue per short Ton than the rest of the USA Coal Exports
- Seattle Export Demand has fallen 20 % from peak in 2011
- The Port of Seattle has Exported Coal to 15 Countries
- Millennium Bulk Terminal – Longview proposal at 48,500,000 Short Tons per Year is larger than any USA Port
- Washington Economy is sufficiently diversified in Coal Exports now without a new Coal terminal

Based on this review, I do not see a need for additional diversification of exports from Washington State or need for an additional coal export terminal (MBTL- Longview) and recommend the “No Action Alternative” Unemployment in Cowlitz County will not be significantly improved with the addition of 135 jobs related to this proposal. Page S-4

Comment #9 – The best use of the 190 acres of land to reduce unemployment in Cowlitz County is to plant carrots. Research indicates that 30,000 pounds of carrots can be harvested from one acre of land and so 190 acres can generate 5.7 million pounds a year. The possibilities are endless in use of local labor to raise the carrots. Page S-4

Comment #10 - At full terminal operations, the Proposed Action would bring approximately 8 loaded unit trains each day carrying coal to the project area, send out approximately 8 empty unit trains each day from the project area, and load an average of 70 vessels per month or 840 vessels per year, which would equate to 1,680 vessel transits in the Columbia River annually.

The SEPA DEIS Indicates that the project is designed for a minimum of 30 years, however realistically the project could be operational for 60 to 100 years until global nations really address climate change and greenhouse gas emissions.

Transportation	1 Year	30 Years	60 Years	100 Years
Rail Cars Loaded	365,000	10,950,000	21,900,000	36,500,000
Unit Trains Loaded	2,920	87,600	175,200	292,000
Marine Vessels Loaded	840	25,200	50,400	84,000

At what point is the long term process addressed and not only very short time periods. Page S-6

Comment #11 - The U.S. is a net exporter of coal. [17](#) US net coal exports increased ninefold from 2006 to 2012, peaked at 117 million short tons in 2012, then declined to 63 million tons in 2015. In 2015, 60% of net US exports went to Europe, 27% to Asia. The largest individual country export markets were the

Netherlands (12.9 million short tons), India (6.4 million short tons), Brazil (6.3 million short tons), and South Korea (6.1 million short tons). Coal exports to China, formerly one of the major markets, declined from 8.3 million short tons in 2013, down to 0.2 million tons in 2015. <sup>[18][19]</sup>

In 2012, six [coal export terminals](#) were in the planning stages in the [Pacific Northwest](#).<sup>[20]</sup> They were scheduled to be supplied by strip mines in the [Powder River Basin](#). The export markets were South Korea, Japan, China, and other Asian nations. Like the [Keystone Pipeline](#) the building of the terminals raised environmental concerns with respect to [global warming](#).<sup>[21]</sup> As of February 2016, four proposals for coal terminals had been withdrawn, leaving two still applied for. The withdrawals were ascribed to loss of demand and consequent lower coal prices. Wikipedia – Coal Mining in the US

Comment #12 – There are coal deposits in Washington State that are potentially marketable for use as export. The Power Plant at Centralia has an adjacent mine called the Centralia coal mine that shutdown in 2006. At that time 9 unit trains of coal a week were being mined with 600 employees and about 4.5 million tons a year. Why does the coal have to be from the Powder River and Uinta Basins and not the Local Coal in Lewis County less than 50 Miles from Longview. Page S-6

Comment #13 - The document reviewed 23 different areas and identified Significant Adverse Environmental Impacts that cannot be mitigated in 9 areas. This overwhelmingly indicates the project has major obstacles to mitigate and is sufficient reason to proceed with the “No Action Alternative” at this time and STOP this Millennium Bulk Terminals – Longview Coal Export Terminal. Page S-10

Comment #14 - Proposed mitigation measures are outlined in Table S-2. If the proposed mitigation measures were implemented, impacts would be reduced but would not completely eliminate significant adverse environmental impacts resulting from construction and operation of the Proposed Action. Unavoidable and significant adverse environmental impacts could remain for nine environmental resource areas: social and community resources; cultural resources; tribal resources; rail transportation; rail safety; vehicle transportation; vessel transportation; noise and vibration; and greenhouse gas emissions Page S-40

The Three areas Built, Natural and Operations have “Unavoidable and Significant Adverse Environmental Impacts”

<b>Built Environment</b>	<b>Natural Environment</b>	<b>Operations</b>
Land and Shoreline Use	Geology and Soils	<b>Rail Transportation</b>
<b>Social and Community Resources</b>	Surface Water and Floodplains	<b>Rail Safety</b>
Aesthetics, Light, and Glare	Wetlands	<b>Vehicle Transportation</b>
<b>Cultural Resources</b>	Groundwater	<b>Vessel Transportation</b>
<b>Tribal Resources</b>	Water Quality	<b>Noise and Vibration</b>
Hazardous Materials	Vegetation	Air Quality

	Fish	Coal Dust
	Wildlife	<b>Greenhouse Gas and Climate Change</b>
	Energy and Natural Resources	

This SEPA DEIS Review should not have to “Ring the Bell” in all 23 areas to make the determination of NO ACTION ALTERNATIVE. Nine areas are more than sufficient to end this project. Page S-40.

Land and Shoreline Use - The Applicant would be required to obtain the appropriate land use, shoreline, and critical areas permits from Cowlitz County and Ecology to ensure compliance and consistency with the applicable land use and shoreline management programs.

Aesthetics, Light, and Glare - Therefore, the Proposed Action would result in a moderate level of impact from the Dibblee Beach viewpoint

Hazardous Material – The Applicant would also be required to comply with water pollution laws to avoid or minimize pollutants entering surface waters and groundwater by obtaining and complying with the NPDES Industrial Stormwater Permit.

Geology and Soils - Additionally, preloading the stockpile areas would reduce the susceptibility of the soils to liquefaction and would reduce the potential for damage to proposed structures that occur in the immediate vicinity of the preloading area.

Surface Water and Floodplains - Construction of the Proposed Action would modify existing drainage, such that during operations less stormwater would be discharged to CDID Ditch 1 (estimated to be 26.3 million gallons/year compared to 88 million gallons/year currently). This change could have a beneficial indirect impact on the ditches because less water could reduce the risk of flooding during significant rain events.

Wetlands -Construction of the Proposed Action would result in 24.10 acres of permanent wetland loss.

Groundwater -The Applicant would be required to obtain a NPDES Industrial Stormwater Permit and would develop a separate system of stormwater collection, treatment and discharge regulated by the separate permit

Water Quality - Coal could enter water as either coal dust or as the result of a coal spill. The potential risk for exposure to toxic chemicals contained in coal would be relatively low as these chemicals tend to be bound in the matrix structure and not quickly or easily leached. Coal dust particles would likely be transported downstream by river flow and either carried out to sea or distributed over a sufficiently broad area that a measurable increase in concentrations of toxic chemicals in the Columbia River would be unlikely.

Vegetation - Operations within the project area and when transporting coal by rail could generate coal particles and fugitive coal dust, which could be deposited on vegetation, soils, and sediments.

Fish - Coal dust and fugitive coal particles could be generated during operations of the Proposed Action and rail transport that could potentially affect fish through physical or toxicological means

Wildlife -Coal dust and fugitive coal particles could be generated during operations of the Proposed Action and rail transport that could potentially impact wildlife through physical or toxicological means.

Energy and Natural Resources -The demand for energy would not be significant compared to current demand and is anticipated to be met by the existing local and regional supply.

Air Quality - A computer modeling analysis was performed to assess emissions from operation of the Proposed Action and the impact on localized air quality. The analysis determined the estimated maximum concentrations for each criteria air pollutant would be below the National Ambient Air Quality Standards established by the U.S. Environmental Protection Agency.

Coal Dust - While the average and maximum deposition of coal dust on the BNSF main line in Cowlitz County was estimated to be above the nuisance thresholds at 50 and 100 feet, respectively, no state or federal standards apply, and this would be an unavoidable but not significant impact.

Comment #15 – Cumulative Impacts - The potential impacts of the Proposed Action in combination with the reasonably foreseeable future actions could result in cumulative impacts on the following 21 environmental resource areas: land and shoreline use; social and community resources; aesthetics, light, and glare; cultural resources; tribal resources; geology and soils; surface water and floodplains; wetlands; water quality; vegetation; fish; wildlife; energy and natural resources; rail transportation; rail safety; vehicle transportation; vessel transportation; noise and vibration; air quality; coal dust; and greenhouse gas emissions. Chapter 6, *Cumulative Impacts*, of this Draft EIS presents the findings of the cumulative impacts analysis.

The Only Items missing were Hazardous Materials and Groundwater. This indicates that the cumulative impacts for the 26 potential foreseeable projects are significant and combined will be a “toxic stew”. The next 20 years are critical for the long term planning for Cowlitz County and Washington State. The choice of the 26 potential projects needs to be carefully reviewed from the economic benefit, employment, and other factors for the long term or the basic viability and livability of the region will decline so much that residents will move out and result in a rapid decline of housing and employment. Page S-40

Comment #16 – Unavoidable and Significant Adverse Environmental Impacts for the proposal should be sufficient to consider the recommended “No Action Alternative”. They are as follows:

#### Social and Community Resources

Implementation of the Proposed Action would increase rail traffic that would increase noise levels along the Reynolds Lead and BNSF Spur in Cowlitz County. The increased noise levels from 16 trips per day related to the Proposed Action would expose noise-sensitive receptors to moderate and severe noise impacts per applicable criteria. These noise impacts would occur in areas with minority and low-income populations; therefore, the Proposed Action would have a disproportionately high and adverse effect on minority and low-income populations. If the mitigation measure to implement a Quiet Zone is approved,

it would eliminate the need for trains related to the Proposed Action to sound horns as they approach the at-grade crossings, and it would eliminate the potential disproportionately high and adverse effect on minority and low-income populations. However, without approval and implementation of a Quiet Zone, the Proposed Action's **disproportionately high and adverse effect** on minority and low-income populations would be unavoidable.

#### Cultural Resources

Demolition of the Reynolds Metals Reduction Plant Historic District is an **unavoidable and significant adverse environmental impact**. The Memorandum of Agreement is currently being negotiated among the Corps, Cowlitz County, DAHP, City of Longview, BPA, National Park Service, potentially affected Native American tribes, and the Applicant. The Memorandum may resolve this impact in compliance with Section 106 of the National Historic Preservation Act of 1966.

#### Tribal Resources

Activities related to the Proposed Action would cause physical or behavioral responses in fish or affect aquatic habitat in the Columbia River. These impacts could reduce the number of fish surviving to adulthood and returning to areas upstream of Bonneville Dam, thereby affecting the number of fish available for harvest by the tribes. Trains related to the Proposed Action would **travel through areas adjacent to and within the usual and accustomed fishing areas of Native American Tribes** and could restrict access to tribal fishing areas in the Columbia River. Because other factors besides rail operations affect fishing opportunities, such as the number of fishers, fish distribution, timing, and duration of fish migration periods and seasons, the extent to which rail operations related to the Proposed Action would affect tribal fishing is difficult to quantify. Making a determination of significance related to treaty reserved rights related to traditional fishing sites on the Columbia River is not determined in this SEPA Draft EIS.

#### Rail Transportation

Without improvements to increase capacity, the Reynolds Lead; BNSF Spur; and three segments of the BNSF main line routes in Washington State (Idaho/Washington State Line–Spokane, Spokane–Pasco, and Pasco–Vancouver) are not projected to have the capacity to handle baseline rail traffic and Proposed Action-related rail traffic in 2028. BNSF could address capacity issues with capital improvements or operational changes, but it is unknown when these actions would be taken or permitted. Therefore, with existing infrastructure and using the methods to identify projected rail traffic in 2028, the Proposed Action could result in an **unavoidable and significant adverse environmental impact** on rail transportation.

#### Rail Safety

Trains related to the Proposed Action could increase the number of potential train accidents along the rail routes in Cowlitz County and Washington State. BNSF and UP could address safety issues as they emerge using capital improvements or operational changes, but it is unknown when those actions would be taken or permitted. Therefore, the Proposed Action could result in a **significant adverse environmental impact** on rail safety in Cowlitz County and Washington State.

#### Vehicle Transportation

Vehicle delay would occur in Cowlitz County if trains related to the Proposed Action travel during peak travel times at six at-grade crossings on the Reynolds Lead without planned track improvements to the Reynolds Lead and BNSF Spur, four crossings on the Reynolds Lead and BNSF Spur with planned improvements to the Reynolds Lead and BNSF Spur, and two crossings on the BNSF main line in Cowlitz County. Vehicle delay could affect emergency service providers. The Proposed Action would also result in a significant and adverse impact related to vehicle safety at the 3rd Avenue crossing of the Reynolds

Lead. While improvements for rail and road infrastructure have been proposed, it is unknown when these actions would be permitted and implemented. Therefore, the Proposed Action at full operations in 2028 could result in **unavoidable and significant adverse impacts** on vehicle transportation in Cowlitz County.

#### Vessel Transportation

If an incident occurred during vessel transportation, such as a collision or allision, the impacts could be significant, depending on the nature and location of the incident, the weather conditions at the time, and whether any fuel is discharged. Although the likelihood of a serious incident is very low, there are **no mitigation measures that can completely eliminate the possibility of an incident** or the resulting impacts.

#### Noise and Vibration

Implementation of the Proposed Action would increase rail traffic that would increase noise levels along the Reynolds Lead and BNSF Spur in Cowlitz County. The increased noise levels from 16 additional daily train trips related to Proposed Action would expose noise-sensitive receptors to moderate and severe noise impacts per applicable criteria. These increases could occur near four public at-grade crossings on the Reynolds Lead. These noise impacts would be from train horn noise that is intended for public safety. Railroad noise is exempt from Washington State and local noise limits; however, it is possible for communities to work with the Federal Railroad Administration to apply for and implement a Quiet Zone to limit train horn sounding. The Applicant could work with the City of Longview, Cowlitz County, Longview Switching Company, the affected community, and other applicable parties to apply for and implement, if approved, a Quiet Zone. However, if a Quiet Zone is not implemented and train horns related to the Proposed Action are sounded for safety at the four grade crossings, then the potential for exposure to severe noise increases at these grade crossings would remain and would be an **unavoidable and significant adverse environmental impact**.

#### Greenhouse Gas Emissions

Implementation of the Proposed Action would result in increased greenhouse gas pollution. Greenhouse gas emissions attributable to the Proposed Action would occur from construction, operation, transportation and changes in coal and natural gas usage. The greenhouse gas emissions attributable to the Proposed Action would be reduced but not entirely eliminated by implementing the proposed mitigation measures related to fuel efficient equipment, anti-idling policies, and a mitigation plan. The Proposed Action's remaining projected increase in greenhouse gas emissions would still **be significant and adverse** under the greenhouse gas emission intensity considerations used for the analysis

All Nine of these areas support the "No Action Alternative" for the Project. Page S-41 to S-43

#### Comment #17 - Required Permits Plans Actions and Approvals

Prior to the full release to begin Construction and operation activities, the following are the Minimum Requirements from this point going forward:

- Receive SEPA Draft Environmental Impact Statement Comments from Agencies, Business, Tribes, and Public
- Publish the SEPA Final Environmental Impact Statement Document
- Publish the Draft Health Impact Assessment Document for Public Comments
- Receive Health Impact Assessment Comments
- Issue Final Health Impact Assessment Document

- Issue the NEPA Draft Environmental Impact Statement Document
- Receive NEPA Draft Environmental Impact Statement Comments from Agencies, Business, Tribes, and Public
- Issue the NEPA Final Environmental Impact Statement Document

After all of this, the permits and approvals can begin the approval process.

#### **Local**

- Cowlitz County Department of Building and Planning—Shoreline Substantial Development Permit
- Cowlitz County Department of Building and Planning—Shoreline Conditional Use Permit
- Cowlitz County Department of Building and Planning—Critical Areas Permit
- Cowlitz County Department of Building and Planning—Floodplain Permit
- Cowlitz County Department of Building and Planning—Building and Site Development Permits
- Three Rivers Regional Wastewater Authority—Wastewater Discharge Permit
- City of Longview—Utility Service Permit
- Southwest Clean Air Agency—Notice of Construction

#### **State**

- Washington State Department of Ecology—Clean Water Act Section 401 Water Quality Certification
- Washington State Department of Ecology—National Pollutant Discharge Elimination System Construction Stormwater General Permit
- Washington State Department of Ecology—National Pollutant Discharge Elimination System Industrial Stormwater Permit
- Washington State Department of Ecology—Stormwater Pollution Prevention Plan
- Washington State Department of Ecology—Water Rights Permit
- Washington State Department of Ecology—Shoreline Conditional Use Permit
- Washington Department of Fish and Wildlife—Hydraulic Project Approval

#### **Federal**

- U.S. Army Corps of Engineers—Clean Water Act Section 404 Permit
- U.S. Army Corps of Engineers—Rivers and Harbors Act Section 10 Permit
- U.S. Army Corps of Engineers—Section 106 of the National Historic Preservation Act compliance
- U.S. Fish and Wildlife Service and National Marine Fisheries Service—Endangered Species Act Consultation
- National Marine Fisheries Service—Marine Mammal Protection Act

This is a long and detailed process for the largest Coal Export Terminal in North America and it should be very structured and not open for interpretation. The SEPA DEIS indicates a simple path for the proposal approvals. Page S-44

#### **Comments on Chapter 1 Introduction**

Comment #18 – The co-lead agencies invited local agencies, state agencies, federal agencies, tribes, organizations, and members of the public to comment on the scope of the SEPA and NEPA EISs during a 95-day scoping period. The scoping period began on August 16, 2013, and closed November 18, 2013. The co-lead agencies collected over 217,500 comments at in-person scoping meetings, online, and in writing.

With over twice as many comments as there are citizens in Cowlitz County, this proposal requires a very rigorous review of the DEIS and the final decision as the commenters are carefully reviewing the actions related to the EIS. Page 1-3

**Comments on Chapter 2 Project Objectives, Proposed Actions, and Alternatives**

Comment #19 - Applicant’s objectives for the Proposed Action, which are listed below and described in the following sections.

- Enable western U.S. coal to compete in the Pacific international coal supply market.
- Diversify Washington State’s trade-based economy.
- Reduce local unemployment

I have reviewed nearly 8,000 entries in the Energy Information Administration and Department of Commerce for the period 2002 through 2015 related to US Coal Exports of Steam Coal, Metallurgical Coal, and Coke.

Based on this review, I determine that western U.S. Coal is currently going to Pacific Rim Countries, and I do not see a need for additional diversification of exports from Washington State or need for an additional coal export terminal (MBTL- Longview) and recommend the “No Action Alternative”.

9. USA Exports 2002 -2015 with 7,982 Load Tickets

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Metallurgical Coal	<b>119,990</b>	<b>\$ 6,106,740</b>	<b>\$50.89</b>

Coke	<b>8,118</b>	<b>\$ 3,639,721</b>	<b>\$448.35</b>

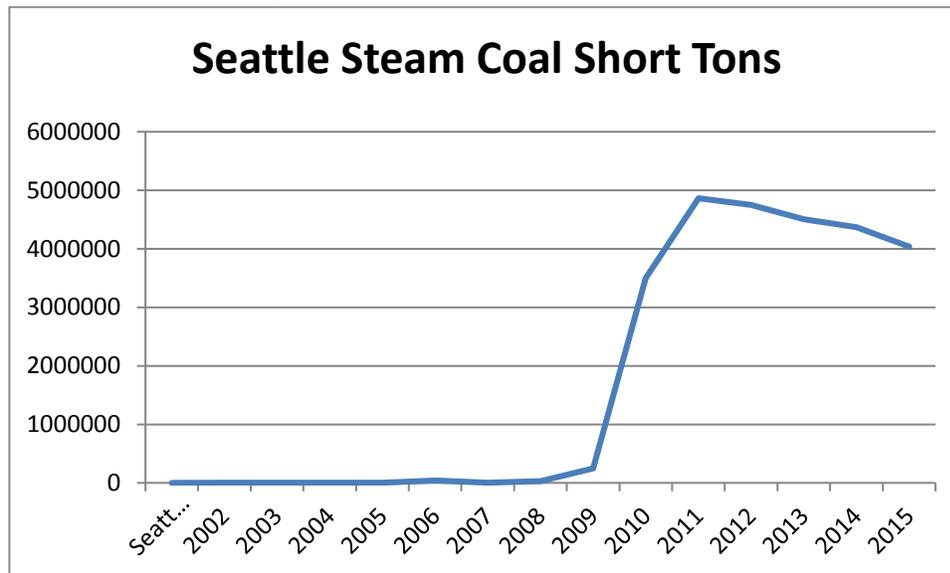
12. USA Exports 2015 Only with 599 load tickets

Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	27,951,029	\$ 1,577,475,160	\$56.44
Metallurgical Coal	46,006,859	\$ 4,108,921,314	\$89.31
Coke	856,878	\$ 197,114,970	\$230.04

13. Seattle Washington Exports 2015 Only with 60 Load Tickets

Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	4,036,724	\$ 130,764,680	\$32.39
Metallurgical Coal	0	0	0
Coke	829	\$ 616,903	\$744.15

14. Seattle Washington Steam Coal Exports by Year 2002-2015



15. Pacific Ocean Port Exports to the following 41 Countries (List Only) with the numbers and Bold from the Port of Seattle Only

<b>South Korea - 45</b>	<b>Thailand - 28</b>	Peru	<b>India - 5</b>
Brazil	<b>New Zealand - 1</b>	Pakistan	Italy
Chile	<b>Australia - 20</b>	Saudi Arabia	Oman

<b>Singapore - 23</b>	France	Philippines	Sweden
Ivory Coast	Vietnam	Kazakhstan	Greece
<b>Japan - 29</b>	El Salvador	Mexico	Belgium
<b>Taiwan - 15</b>	Russia	<b>Netherlands -1</b>	South Africa
<b>China - 25</b>	Slovenia	Guatemala	<b>Brunei -9</b>
<b>Hong Kong - 8</b>	<b>Malaysia - 24</b>	Kuwait	Bolivia
Indonesia	<b>Canada - 54</b>	Libya	United Arab
<b>Spain – 1</b>			

16. Observations by Bill Brake

- Metallurgical Coal is Top Export from USA followed by Steam Coal
- Steam Coal is Top Export from Pacific Ocean Port Cities
- Pacific Ocean Port Cities are San Diego, Los Angeles, San Francisco, Portland, Seattle and Anchorage
- Seattle Washington is over half of Steam Coal Exports from Pacific Ocean Cities
- Pacific Ocean Ports and Seattle have significantly Lower Revenue per short Ton than the rest of the USA Coal Exports
- Seattle Export Demand has fallen 20 % from peak in 2011
- The Port of Seattle has Exported Coal to 15 Countries
- Millennium Bulk Terminal – Longview proposal at 48,500,000 Short Tons per Year is larger than any USA Port
- Washington Economy is sufficiently diversified in Coal Exports now without a new Coal terminal

Additionally the proposed 135 jobs for the new Coal Export Terminal with the total Cowlitz County Employment at 42,324 persons and 3,408 persons unemployed will not significantly change the labor statistics. This Proposed Millennium Bulk Terminal Longview LLC Project is 480 times bigger than the current Longview operation and only has 3.6 times more employees to unload the coal product, store the coal on site and load into ships. It is also 9 times bigger than the Centralia Power Plant Coal unloading, storage and conveying to the power plant burner tip. The manpower proposal for the Longview Terminal are unrealistic and need to be further evaluated.

The “No Action Alternative” is recommended for this proposal. Page 1-1

Comment #20 - The Applicant determined there is sufficient Asian market demand for U.S. low-sulfur coal to warrant the development of a coal export terminal in the western United States for shipping Powder River Basin and Uinta Basin coal to Asian markets.

The BTU Heating Value of Western Coal is 8,000 BTU/# and the Local High Sulfur Coal Currently in use in Asian Countries is 12,000 BTU/#. To provide the same amount of energy to a power plant or other industrial uses requires +50 % more volume by weight of coal.

Typical process equipment is sized between 50 and 110 % of design capacity and therefore to change to Western Coal requires significant increase (+50%) in Labor, Unloading, Stockpiling, Conveying, and Burner and Ash Disposal equipment .

Therefore any Western Coal will not be used to offset current operations and will only be used in new capital projects with sufficiently sized process equipment. Page 1-3

Comment #21 - The Proposed Action would also require constructing a trestle and two docks, with one shiploader on each dock. The trestle and docks would require 630 36-inch pilings, 610 of which would be installed below the ordinary high water mark (OHWM) of the Columbia River. Most pilings would be installed approximately 140 to 165 feet below the mudline, using vibratory pile drivers and an impact pile driver for proofing. This is not a simple or easy project and requires expert project management skills and expertise not common to the Pacific Northwest. These structures will remain in the Columbia River for centuries and are not recoverable at the end of the project life. Page 2-11

Comment #22 - The Applicant Lease Area has rail tracks in an area that is not part of the lease. Should there be a problem or liability, this is a 'finger pointing nightmare' that needs to be resolved before construction and not after operation.

A small portion of the rail loop would be constructed on two parcels currently owned by Bonneville Power Administration (BPA) (Figure 2-3). One parcel contains an access road and substation. To maintain or provide for pedestrian and vehicular access to BPA facilities, the Applicant would construct an access road between the Proposed Action access road and the BPA yard, and install a gate to the BPA yard at a location to be determined by BPA. According to the Applicant, BPA will not make a determination whether to sell or grant an easement to the Applicant until after the U.S. Army Corps of Engineers (Corps) publishes the National Environmental Policy Act Final EIS for the coal export terminal Reference to plot plan on page 2-12 of SEPA DEIS.

Comment #23 - The rail car tandem rotary dumper has a conveyor belt rated at 7,500 metric tons per hour. This times 24 hours in a day x 365 days per year yields 65.7 million metric tons per year. The Facility is designed for a 44 million metric ton per year rate and this equipment is significantly oversized or is 150 % too big. This can allow the MBTL to expand operations without adding equipment. The DEIS needs to address what is the pinch point of the operations and how is it guaranteed that the MBTL does not exceed permit guidelines. Since there is not a weight measurement, there needs to be some method to do the accounting. Page 2-14 SEPA DEIS

Comment #24 - The stockpile pads together would be able to hold approximately 1,500,000 metric tons of coal. The pads would vary in length from 2,200 to 2,500 feet and could hold from 360,000 to 400,000 metric tons each. Coal would be stacked to approximately 85 feet above the pads. That is a lot of weight equal to the Empire State Building at 365,000 Tons Weight so each stock pile is the same as one Empire State Building and the 85 feet is about a 9 story building. Just throwing a bunch of rubble to preload the soil is not the solution and detailed calculations are required to do proper planning and construction. Page 2-15

Comment #25 - Water Systems - Peak process water demand would be approximately 5,000 gallons/minute is not the average usage but has an influence on the water supply requirements for the proposal. Page 2-15

Comment #26 - As a registered professional engineer, I know a little about math.

The Millennium Bulk Terminals at Longview Coal Export Terminal Proposal will be the largest Coal Export Terminal in North America at 44 million Metric Tons per year. This proposal will receive 365,000 rail cars a year and load out 840 Marine Vessels of the Panamax and Handymax Class for Asian ports.

The Draft SEPA Environmental Impact Statement on page 2-16 states that the Panamax Vessels have a draft of 42 to 49 feet and that the main shipping channel on the Columbia River is 43 feet deep at low tide.

If my math is correct, it looks like the Panamax Vessels will drag bottom. Page 2-16

Comment #27 - Rail Transit - Unit trains would consist of 3 locomotives and 125 coal cars, with a total length of 6,844 feet is stated in the SEPA DEIS. Mountain terrain and flat terrain do not require the same horsepower as well as loaded and empty unit trains. Visual Observations in the Vancouver Rail Yard indicate that typical Coal Trains have as many as 5 locomotives and therefore the emissions, greenhouse gas, particulates, crossing wait times and other factors are in error. Page 2-23

Comment #28 - Rail Transit - In 2012, BNSF changed its train operations protocol in Washington State using directional running to enhance use of existing capacity. This strategy routes all westbound-loaded unit trains (including coal) from Pasco via the Columbia River Gorge to Vancouver, where they continue on the BNSF north-south main line to their final destination. Empty unit bulk trains north of Vancouver, including Cowlitz County, return to Pasco and to points east via Auburn and Stampede Pass.

However, the preferred rail route is not the only rail route due to maintenance, landslides, snow or other factors The Stampede Pass Route (Elevation 3,672 feet) was not in service for 12 years between 1984 and 1996 and does not have sufficient height clearance for double stacked container rail cars. Page 2-26

### **Comments on Chapter 3 Built Environment**

Comment #29 – Land and Shoreline Use – No Action Alternative

The Columbia and Snake River System has 102 dams and a water shed area The **Columbia River** is the largest river in the [Pacific Northwest](#) region of North America.<sup>[9]</sup> The river [rises](#) in the [Rocky Mountains](#) of [British Columbia](#), Canada. It flows northwest and then south into the US state of [Washington](#), then turns west to form most of the border between Washington and the state of [Oregon](#) before emptying into the Pacific Ocean. The river is 1,243 miles (2,000 km) long, and its largest [tributary](#) is the [Snake River](#). Its [drainage basin](#) is roughly the size of France and extends into seven US states and a Canadian province.

By volume, the Columbia is the fourth-largest river in the United States; it has the greatest flow of any North American river draining into the Pacific. The river's heavy flow and its relatively

steep [gradient](#) gives it tremendous potential for the generation of electricity. The [14 hydroelectric dams](#) on the Columbia's [main stem](#) and many more on its tributaries produce more [hydroelectric power](#) than those of any other North American river

Year		Range	Number	Current	Percent
			Completions	Age in Years	
1888	to	1899	5	116 to 127	5%
1900	to	1919	16	96 to 115	16%
1920	to	1939	16	76 to 95	16%
1940	to	1959	24	56 to 75	24%
1960	to	1979	29	36 to 55	28%
1980	to	1999	7	16 to 35	7%
2000	to	2015	1	0 to 15	1%
Unknown			4	Unknown	4%
		Total	102		100%

### Millennium Bulk Terminal – Coal Export Terminal DEIS

The location of the proposed MBTL Coal Export Terminal is where the Cowlitz and Columbia Rivers merge and is a historic flood plain depositing silt, sediment and trash for many thousands of years.

Flooding of the Willamette, Cowlitz and Columbia River are not uncommon events and is evident in the following Photos for the years 1894, 1948, 1964, and 1996.



FLOOD 1996





6/15/48 AERIAL VIEW FLOOD WATERS  
Vandort area West from N. Denver Ave.



6/9/48 FLOOD WATERS  
Railroad Yards vicinity of  
Union Station





As can be seen the damage is significant and the potential damage for a Crude Oil Terminal at the Port of Vancouver would be even worse. These are not the 100 year, 200 year, or 500 year floods that change the course of history but are the twenty year variety that are repetitive.

There are 102 Dams on the Columbia and Snake River System and they vary from 7 to 127 years old. The typical dam used for flood control has a useful life of 60 years and many of these dam structures are older than that age. The massive hydroelectric dams are reportedly good for a 200 year life, but this is a very questionable and subjective assertion as none of the dams has reached that age. The Bonneville Dam is the last dam structure upstream of the Millennium Bulk Coal Export Terminal and is currently 78 years old.

Many scenarios can result in the lowering of the level behind a dam for inspection and repair purposes and the sudden movement of large volumes of water to the next dam down river can result in a flooding situation. The Willamette River is a wild, uncontrolled river and any change in the watershed is immediate and instantaneous.

Even with the CDID #1 Dike System, the Millennium Site is subject to the 100 year, 200 year, and 500 year floods. It is obvious, no one is prepared for the worst case scenario and hence the "No Action Alternative" is recommended for this project. Page 3.1-17 SEPA DEIS

Comment #30 –The existing jobs in Cowlitz County data indicates the following:

Employable People that Live in Cowlitz County	+52,341 Workers
Live in Cowlitz County and Work Outside County	-23,353 Workers
Live Outside Cowlitz County and Work in Cowlitz County	+11,233 Workers
Net Employment in Cowlitz County	=31,988 Workers

It is observed that almost half the employable people that live in Cowlitz County work outside the County. (23,353/52,341 = 44%). As An Engineer, in 35 years of work, I had only nine years that my reporting office was within 5 miles of home and the remaining 26 years my reporting location was between 10 and 400 miles away. Page 3.2-13 SEPA DEIS

Years	Home to Office	Method	Percent	Company
1970-1973	40 to 100 miles	Drive	90%	Mobil
1973-1980	20 to 140 miles	Drive	66%	Phillips
1980-1982	500 to 1,000 miles	Fly ,Motel, Drive	25%	Phillips
1982-1990	10 to 180 miles	Drive	100%	Phillips
1990-1996	90 to 400 miles	Drive, Apartment	100%	Phillips
1996-2005	5 to 150 miles	Drive, Apartment	100%	Williams
2005-2016	Retired			

The last two years of work were in Northwest New Mexico and Leave at 5:30 AM and drive 105 miles over the Continental Divide with 4 wheel drive and snow in the winter for a 7:00 AM meeting at the processing plant at 7,200 foot elevation. Work on site or within 50 miles until 5:00 PM and then drive 105 miles home arriving at 7:00 PM on a good day. When I was working 14 hour days without overtime compensation, retirement looks pretty good.

The Bottom Line is that work specialization can result in work outside the county of residence and the 135 potential new jobs at the Millennium Bulk Coal Export Terminal will not change personal habits.

Comment #31 - The proposed facility has a 360,000 gallon fire water pond. With the on-site fire pump rated at 1,500 gallons per minute, there is 240 minutes of water or 4 hours. After that time, an on-site fire is allowed to burn itself out. This is typical of process plants with 4 hour on site fire water to comply with company and insurance requirements. What is proposed if the fire continues beyond the 4 hour time period --- a river pump, interconnection to municipal systems, water tenders, or unknown? Page 3.2-23 SEPA DEIS pdf 48/147

Comment #32 – The Tax Revenue for the proposed facility is as follows:

Operation of the Proposed Action would generate property taxes, combined state and local sales and use taxes, and B&O taxes. The greatest share of state, county, and special purpose district taxes would be generated by property taxes. Operation of the Proposed Action is estimated to generate an annual average of \$1.65 million in Cowlitz County revenue and a 30-year present value of \$32.37 million in tax revenues. At the state level, operation of the Proposed Action is estimated to generate an annual average of \$2.18 million and a 30-year present value of \$41.77 million in tax revenues. County taxes are shared

with cities, allocated on the basis of population. Local taxes have historically been spent primarily on schools, roads, and emergency services, all of which have the potential for direct or indirect positive impacts on public health and safety.

I will use the one year numbers as the 30 year present value numbers are meaningless as forecasting 30 years in the future is a true unknown.

**Cowlitz County**                **\$1,650,000 Per Year Tax Revenue / 365,000 rail cars = \$4.52 per Rail Car**

**Washington State**        **\$2,180,000 Per Year Tax Revenue / 365,000 rail cars = \$5.97 per Rail Car**

**Total Tax Revenue**        **\$3,830,000 Per Year Tax Revenue / 365,000 rail cars = \$10.49 per Rail Car**

One Rail Car is about 120 tons of coal at a market price of about \$40. / ton = \$4,800 so that there is a lot of middleman operations making a lot of profit and \$10.49 / rail car tax revenue is not sufficient for the risk the project presents. It is recommended that the “No Action Alternative” be chosen. Page 3.2-23 SEPA DEIS pdf 48/147.

Comment #33 – The Tax Revenue Stream of \$10.49 / Loaded rail car of coal does not consider that there is \$0.00 Tax Revenue for the Empty rail cars returning to the mines. Also there is \$0.00 Tax Revenue for the empty marine vessels travelling from Asian Ports. All the negative impacts of this proposal are still occurring with \$0.00 Tax Revenue for the empties. No Action Alternative is the Only Option. Page 3.2-23 SEPA DEIS pdf 48/147.

Comment #34 – The coal dusting from the loaded rail cars is valuable asset that is not recovered. Scientific data indicates 500 pound of coal dust is lost for every rail car. With 365,000 loaded rail cars per year, this coal dust loss represents one-quarter ton per rail car and coal is marketed at \$40 per ton results in \$10.00 per rail car coal dust losses which is equivalent to the Tax Revenue for the State of Washington and Cowlitz County Combined. Although economics are not part of the Environmental DEIS, It makes you wonder the real benefit of the MBTL Coal Export Terminal Proposal The No Action Alternative is recommended. Page 3.2-23 SEPA DEIS pdf 48/147.

Comment #35 - The Applicant Lease Area has rail tracks in an area that is not part of the lease. Should there be a problem or liability, this is a ‘finger pointing nightmare’ that needs to be resolved before construction and not after operation. Page 3.2-24 SEPA DEIS pdf 49/147.

Comment #36 - A small portion of the rail loop would be constructed on two parcels currently owned by Bonneville Power Administration (BPA) (Figure 2-3). One parcel contains an access road and substation. To maintain or provide for pedestrian and vehicular access to BPA facilities, the Applicant would construct an access road between the Proposed Action access road and the BPA yard, and install a gate to the BPA yard at a location to be determined by BPA. According to the Applicant, BPA will not make a determination whether to sell or grant an easement to the Applicant until after the U.S. Army Corps of Engineers (Corps) publishes the National Environmental Policy Act Final EIS for the coal export terminal. This issue needs to be resolved for the proposed applicant or any future business with sustainable

employment and not be a political decision to be made late in the project. BPA should not be allowed to hold the “Trump Card” for any proposal on the former Reynolds Site. . Page 3.2-24 SEPA DEIS pdf 49/147.

Comment #37 - Proposed Action-related trains would increase rail traffic-related noise levels in Archie Anderson Park, along the Highlands Trail, and in Gerhart Gardens Park, all of which are located within 1,000 feet of the Reynolds Lead or BNSF Spur. The No Action Alternative is recommended. Page 3.2-26 SEPA DEIS pdf 51/147.

Comment #38 – According to the SEPA DEIS there are 242 Low Income Residences impacted by the noise levels in and the proposed Coal Export Terminal. Not only will the value of these residences decline due to the noise, it has cumulative impacts that impact those financially last able to move to other areas. How would you feel if this is impacting your residence? The No Action Alternative is recommended. Page 3.2-27 SEPA DEIS pdf 52/147.

Comment #39 - The applicant is proposing to work with the neighborhood to create a “Quiet Zone” on the railroad leading to the Coal Export Terminal. This “Quiet Zone” Only prohibits Train Horns by double gates at grade crossings and extra visibility items. It does not quiet the locomotive engines and the general rumble of the rail cars. Also the expense of a “Quiet Zone” can be anywhere from \$10,000 to \$100,000 and is not paid by the Rail line but by neighborhood associations or taxpayer money. Page 3.2-30 SEPA DEIS pdf 55/147.

Comment #40 – The rail transportation corridor passes through seven known archaeological districts. The Plymouth District, Sk'in Village Cultural District, and Vancouver Lakes Archaeological District contain precontact and historic components. The Crow Butte Island District, Columbia Hills Archaeological District, Miller Island District, and Wishram Indian Village Site all contain precontact features and sites. The highest concentration of previously recorded archaeological resources along the Columbia River are situated near the Celilo Falls area at the confluence with the Deschutes River, The Dalles, and Portland Basin.

The rail Transportation Corridor has rich and many undiscovered areas that need to be preserved for future generations that hopefully will appreciate more the historical significance of the archeological districts. The current generations have not taken care of “Mother Earth”. Page 3.4-13 SEPA DEIS pdf 96/147.

Comment #41 - The corps also carried out a marathon dredging effort that began right after the eruption and continued through the early 1980s. The dredging removed enough material from the Toutle, Cowlitz and Columbia rivers to build a 12-lane highway from New York City to San Francisco, according to the U.S. Geological Survey. From the Seattle Times May 17, 2015 Hal Bernton Reporter.

Due to the eruption of Mount St Helens on May 18, 1980, the taxpayers are paying for the dredging operations on the Columbia, Toutle and Cowlitz Rivers to allow the passage of freight on marine vessels and for flood control purposes. Now the channel is dredged every three years and the frequency in part is based on the amount of river traffic. This is a never ending cycle and the No Action Alternative is recommended for the Coal Export Terminal. General Comment no reference page number.

Comment #42 - - Cowlitz Tribal Rights

Final Determination to Acknowledge the Cowlitz Indian Tribe (2000)

Notice given that the Cowlitz Indian Tribe exists as an Indian tribe within the meaning of Federal Law – i.e., a Federally recognized Indian tribe (Final Determination, Federal Register Notice, 2000.02.18, 65 FR 8436-8438)

The Cowlitz Indians have been federally recognized for the past 16 years and have superior rights for traditional and accustomed fishing and gathering in the Columbia River Basins. Their approval or denial of the proposal is considered critical to the long term maintenance of the Cowlitz Indian Tribes relations. Page 3.5-2 SEPA DEIS pdf 104/147.

Comment #43 – The Table 3.5-2 for the Annual Catch of Salmon, Steelhead, and White Sturgeon in Treaty Commercial, Ceremonial, and Subsistence Fisheries in Zone 6 of the Columbia River only has data for the period 2000 through 2009. Since this is 2016, this data is 8 years old at best. It is requested the data be updated to at least 2015 to better understand the tribal fishing success rates. It is also interesting that no data is collected downstream of Bonneville Dam and the proposed Coal Export Terminal Site is some 83 miles away. Page 3.5-8 SEPA DEIS pdf 110/147.

Comment #44 - A draft cleanup action plan and draft consent decree was released in 2016 for a 60-day public comment period (Washington State Department of Ecology 2016). The comment period ended March 18, 2016. A responsiveness summary will be prepared to address public comments and then the reports will be finalized. Likely remedial technologies will include a combination of, but not necessarily all of, the following: removal, consolidation, capping, groundwater treatment, and monitored natural attenuation treatments. Property owner Northwest Alloys, Inc. (a subsidiary of Alcoa, Inc.) and the Applicant are legally responsible for the cleanup, including paying for and performing the work.

It is amazing and sad that draft clean up action plan and draft consent decree was released for public comments in March 2016 which is as long as 25 years since the first facilities were decommissioned at the site. It makes it even more important that the Millennium Bulk Terminals – Longview Coal Export Terminal Longview have a full and detailed decommissioning and clean up plan or it will be “millenniums” until the clean up is complete. Page 3.6-11 SEPA DEIS pdf 130/147.

Comment #45 - Construction of additional conveyors, buffer bins, and transfer towers, including 26,200 linear feet of conveyors, of which 17,900 linear feet would be open conveyors and 8,300 linear feet would be enclosed This is a massive project with nearly 5 miles of conveyors at full build out and 2/3 of the conveyors are open construction. The No Action Alternative is recommended as the risks from long term damages is greater than the miniscule rewards. . Page 3.6-12 SEPA DEIS pdf 131/147.

Comment #46 – The US DOE BPA Longview Substation and McCalls Trucking are adjacent to the proposed MBTL – Longview site and are 33 feet and 127 feet distance away. Both sites are ranked High Risk Class and are awaiting cleanup. This needs to be addressed now as all that is being made is a “Toxic Stew” for clean up by the public taxpayers money generations in the future. This is a reason for the “No Action Alternative”. Page 3.6-14 SEPA DEIS pdf 133/147

## Comments on Chapter 4 – Natural Environment

Comment #47 – The Water Table in the area is between 3 and 20 feet below grade. Additionally the potential for earthquake with significant damage potential exists with settling between 7 and 16 inches in the area. These factors indicate the existing soil does not have sufficient strength to hold the weight of this proposed project. Significant weakness exists and the No Action Alternative is recommended Page 4.1.9 SEPA DEIS pdf 15/219

Comment # 48 – The Columbia River below Bonneville Dam is considered a wild and uncontrolled river with many rivers, creeks, waterfalls, and streams making a direct connection to the Columbia River. The Columbia River has 17 major tributaries and the Willamette has 14 major tributaries and both systems have numerous lesser connections. Combined there are 67 supply inputs below Bonneville Dam and make this a very wild and dynamic river system. The SPEA DEIS fails to mention this fact and that the river is a wild river system with flood and hydroelectric power dams below Bonneville only of a limited number. Page 4.2.7 SEPA DEIS pdf 30/219

- [Wallacut River](#) (Washington)
- [Chinook River](#) (Washington)
- [Skipanon River](#) (Oregon)
- [Lewis and Clark River](#) (Oregon)
- [Youngs River](#) (Oregon)
  - [Wallooskee River](#) (Oregon)
  - [Klaskanine River](#) (Oregon)
- [Elochoman River](#) (Washington)
- [Clatskanie River](#) (Oregon)
- [Grays River](#) (Washington)
- [Cowlitz River](#) (Washington)
  - [Coweeman River](#) (Washington)
  - [Toutle River](#) (Washington)
  - [Mayfield Dam](#) and [Lake Mayfield](#) (Washington)
  - [Tilton River](#) (Washington)
  - [Mossyrock Dam](#) and [Riffe Lake](#) (Washington)
  - [Cowlitz Falls Dam](#) and [Lake Scanewa](#) (Washington)
  - [Cispus River](#) (Washington)
  - Muddy Fork (Washington)
  - Clear Fork (Washington)
    - [Ohanapecosh River](#) (Washington)
- [Kalama River](#) (Washington)
- [Lewis River](#) (Washington)
  - [Merwin Dam](#) and [Lake Merwin](#) (Washington)
  - [Yale Dam](#) and [Yale Lake](#) (Washington)
  - [Swift Dam](#) and [Swift Reservoir](#) (Washington)
- [Lake River](#) (Washington)
- [Willamette River](#) (Oregon; see [below](#) for sub-tributaries)
- [Washougal River](#) (Washington)
- [Sandy River](#) (Oregon)
  - [Salmon River](#) (Oregon)

- [Zigzag River](#) (Oregon)
- [Bonneville Dam](#) and [Lake Bonneville](#) (Washington, Oregon)

Comment #49 - CDID #1 operates the slough, ditch, and drain system several feet lower than the flow elevation of the Columbia River throughout the year. This strategy provides necessary storm storage capacity and allows the pump system to maximize the flood control potential of the levee interior drainage. The combined capacity of the seven CDID #1 pump stations (a total of 19 pump 700,000 gallons per minute. These pump stations are instrumental for removing storm water and preventing local and area-wide flooding. The need for this pumping capacity is apparent when considering that 1 inch of rainfall on the 16,000-acre watershed is equivalent to 434 million gallons of water. Removal of 4.8 inches of rain deposited in a 1986 storm required 54 hours of continuous pumping.

There has been many times since 1986 that large single event rains are greater than 4.8 inches. The past 30 year data needs to be fact checked for additional high flow events. Page 4.2.12 SEPA DEIS pdf 35/219

Comment #50 - It is anticipated that approximately 1,200 gpm during the wet season and approximately 2,000 gpm during the dry season (approximately 2,034 AFY) would be required on average for dust suppression. With all the concerns on coal dust on the rail lines and on the facility site this proves that "Coal Dust" is a problem. The 2,000 gpm is equal to 2,880,000 gpd and is a significant amount of water that demonstrates "Mission Control – We Have a Problem". Page 4.4.20 SEPA DEIS pdf 81/219

Comment #51 – Water temperatures in the lower Columbia are generally warmest in August, when daily mean water temperatures often exceed 20 degrees Celsius (°C). In general, dissolved oxygen saturation is relatively high and turbidity is relatively low. Data collected on September 11, 2015, at **river mile 53 located near the Beaver Army Terminal indicated an oxygen saturation of 85.5% (9.17 mg/l), temperature of 20.03°C**, and turbidity of 1.61 nephelometric turbidity units (NTU). For contrast, data collected just **below the Bonneville Dam at river mile 145 indicated an oxygen saturation of 97.9% (10.5 milligrams per liter), temperature of 20.07°C**, and turbidity of 2.27 NTUs (Center for Coastal Margin Observation & Prediction 2015).

Water temperature is an important parameter for assessing baseline water quality. The Columbia River is impounded at many locations. These impoundments contribute to elevated water temperature by ponding water and increasing exposure to solar radiation. Although EPA and the Lower Columbia Estuary Partnership did not rate the Columbia River Estuary regarding water temperature, because water temperature affects the water's capacity for dissolved oxygen, **if dissolved oxygen levels are considered good, water temperatures are also fairly good.**

The SEPA DEIS does not adequately explain the relationship between oxygen saturation and dissolved oxygen levels. The difference in the Oxygen Saturation between river mile 53 @ 85.5% and river mile 146 @ 97.9 % does not explain the die off of salmon in the summer of 2015 – Was the die off from hot water, oxygen saturation or dissolved oxygen. Please explain more. Page 4.5.10,11 SEPA DEIS pdf 94,95/219

Comment #52 - Rail cars carrying coal would have to be treated with topping agents or surfactants to the surface of loaded coal to control dust. These agents generally comprise glue (polyvinyl acetate), alkyl alcohol, guar gum, or vegetable oils mixed with water.

There have been additional reports of “Mag Water” Magnesium chloride being used as a coal dust suppression agent as it is widely used for dust suppression on roads. One person advised me that 2 inches of paraffin was placed on top of the coal rail cars to control dust. At this point in the DEIS, a definitive “Dusting Agent” needs to be disclosed and not a general shopping list of possibilities. Page 4.5.26 SEPA DEIS pdf 110/219

Comment #53 - There is no discussion on the possibility of a coal fire from a derailed loaded rail car or the ignition temperature to ignite or combust. A scenario with a diesel spill and ignition of the spilled fuel is not discussed if the coal will burn and create a wildland fire. With much of the rail route inaccessible by road, the only means to get to a wild fire on the rail line is by the BNSF Equipment that can drive on the rails. More information is needed. Page 4.6-25 SEPA DEIS pdf 141/219

Comment #54 - MM CDUST-3. Reduce Coal Dust Emissions from Rail Cars.  
To address coal dust emissions, the Applicant will not receive coal trains unless surfactant has been applied at the BNSF Railway Company (BNSF) surfactant facility in Pasco, Washington for BNSF trains traveling through Pasco. The Pasco Location is 260 miles from the Longview Terminal. The DEIS does not mention if Surfactants are added at the Source at the western coal mines or how many miles the surfactant is reapplied. Since this only applies to Washington State, this is new information, but does not tell the entire story.

Comment #55 - For example, the highest occurrence of stranding occurred at Barlow Point, where 53% of the observed passages resulted in stranding. Stranding occurred less frequently at Sauvie Island (37% of the observed passages resulted in stranding) and County Line Park (15% of observed passages resulted in stranding) (Person et al. 2006). The Proposed Action would add 840 vessel transits to the Columbia River at full build-out, which would introduce additional permanent risk of fish stranding in the Columbia River. With Fish Stranding so important, the No Action Alternative is recommended for this project. Page 4.7.19 SEPA DEIS pdf 162/219

Comment #56 – The Salmon in the Cowlitz River is a sight worth sharing. The photograph was sent to me and it is not my photo however is another reason that the No Action Alternative is recommended for this project. Page 4.7.19 SEPA DEIS pdf 162/219



Comment #57 Seals (Pinnipeds) on Dock at Ranier Oregon

Harassment of pinnipeds can occur between 178 feet and 5.4 miles from the noise source without attenuation, depending on the method of pile-driving. Page 4.8.7 SEPA DEIS pdf 187/219



## Comments on Operations – Chapter 5

Comment #58 –It is interesting but also confusing that the rail weight calculations are in US Short Tons and not the Metric Tons as is discussed throughout all the remainder of the SEPA DEIS. Since this is a US Based proposal all calculations should have been done in US Engineering Units and not Metric Units and especially not a mix of both. Page 5.1-4 SEPA DEIS pdf 10/243

Comment #59 – In 2012, BNSF changed its train operations protocol to enhance use of existing capacity using directional running. This strategy routes **all** westbound-loaded unit trains (including coal) from Pasco via the Columbia River Gorge to Vancouver, where they continue on the BNSF north-south main line to their final destination. Empty unit bulk trains from north of Vancouver, including Cowlitz County, return to Pasco and to points east via Stampede Pass.

The Stampede Pass Tunnel is height limited to single height rail cars and does not allow double stacked Containers. To State **all** is in error. Page 5.1-6 SEPA DEIS pdf 12/243

Comment #60 - Between Longview Junction and the project area there are five public and three private at-grade road crossings. The Longview Municipal Code 11.40.080 (Railroad Trains Not to Block Streets – Prohibits trains from using and street or highway for a period of time longer than five minutes, except trains or cars in motion other than those engaged in switching activities. It appears with 16 trains at a length of 6,844 feet each there is a STRONG PROBABLY that the Trains will exceed the 5 minute Municipal Code. The City of Longview can make more money from Citations than it ever will make off coal. Alternately, how many new \$85 Million Dollar overpasses will be required. This confirms that the No Action Alternative is recommended. Page 5.1-8 SEPA DEIS pdf 14/243

Comment #61 – The Pasco to Spokane Segment is currently in 2015 39/37 or 105 %. This indicates the system is “Bottlenecked” and needs major capital commitments prior to the consideration of 16 additional Full and empty Coal Trains. Additionally, the Spokane to Idaho segment is currently in 2015 70/76 or 92 %. Lastly, the Pasco to Vancouver Segment is currently in 2015 36/40 or 90 % . Here are three reasons to stop the DEIS Now and recommend the No action Alternative. Page 5.1-12 SEPA DEIS pdf 18/243

Comment #62 – The situation only gets worse in 2028 which is 12 years from now with Idaho to Spokane at 160 %, Spokane to Pasco at 189 %, Pasco to Vancouver at 136 % , and Longview to Auburn at 101% Capacity. With no guarantees of Capital Investment, This project has no path except No Action Alternative. Page 5.1-19 SEPA DEIS pdf 25/243.

Comment #63 – The No Action Alternative Rail Map Indicates the Rail System is overloaded in 2028 without the Millennium Bulk Terminal s Longview Coal Export Terminal being built and operated. The Rail System is not designed to handle the volumes and weights of goods currently being transported by Unit Trains. The 1,200 miles from the coal mines to the export terminal have 3,000 rail cross ties per mile and 24,000 rail spikes per mile. The total system has 3.6 million cross ties and 28.8 million rail spikes. The rail system is like many of the other transportation infrastructure and not able to respond to aging and obsolete equipment and maintenance even if money was not an issue. Page 5.1-22 SEPA DEIS pdf 28/243.

Comment #64 - **FRA data (2012–2014)**. Accident rates were compiled from FRA data for 2012 to 2014.<sup>3</sup> Published literature was also used to identify derailment rates by track class.<sup>4</sup> Historically,

accident rates (accidents per train mile) do not change dramatically from one year to the next, but generally trend downward over time because of improved control systems, communications, and inspection practices. The analysis used 3-year data to account for year-to-year variations. Typically, year-to-year accident rates are more consistent than year-to-year traffic volumes on any specific route, which may vary substantially as demands change.

Data from FRA for the states and counties from the Bakken Oil Fields to Vancouver Washington related to the Tesoro Savage Crude Oil terminal are similar for the Coal from the Powder River Basin to Longview Washington. The data indicates the accidents do not decrease over time, but increase and are worse with the higher volume of traffic on the rail roads in the Pacific Northwest. Page 5.2-3 SPEA DEIS pdf 33/243

Data from the PHMSA Data Base is as follows

Ten Year 2005 -2014	Total	Train	Highway	Other	Fatalities
<b>WASHINGTON</b>	688	177	78	435	170
<b>IDAHO</b>	191	29	51	111	34
<b>MONTANA</b>	585	97	49	436	51
<b>NORTH DAKOTA</b>	72	9	14	49	49
<b>TOTAL</b>	<b>1536</b>	<b>312</b>	<b>192</b>	<b>1031</b>	<b>304</b>

It is shocking and very surprising that 304 fatalities occurred in the ten year period 2005-2014 for the crude oil rail route from Williston North Dakota to Vancouver Washington. This data is only for the counties on the most direct rail route and is not inclusive of the entire states.

There are 7 Counties in Washington, 3 Counties in Idaho, 9 Counties in Montana and 1 County in North Dakota for a total of 20 counties and approximately 1,200 miles

This data is readily available and it should have been included and analyzed in the Tesoro Savage DEIS.

A basic principle of management is "Measureable Results" and this data details there are major problems in the rail system and problems are not addressed in a timely basis like simple fencing of rail yards and better visibility at grade crossings.

Details for the 7 counties in the State of Washington are as follows:

WASHINGTON	Clark				
Year	Total	Train	Highway	Other	
2015	1	0	0	1	
2014	18	3	1	14	
2013	11	3	0	8	
2012	8	0	1	7	
2011	18	4	3	11	
2010	20	4	2	14	
2009	25	3	2	20	
2008	17	5	3	9	

2007	17	4	2	11
2006	9	3	1	5
2005	18	3	4	11

Skamania

Year

2015	0	0	0	0
2014	1	0	0	1
2013	0	0	0	0
2012	0	0	0	0
2011	0	0	0	0
2010	3	1	0	2
2009	2	0	0	2
2008	1	0	1	0
2007	3	0	1	2
2006	0	0	0	0
2005	2	1	1	0

Klickitat

Year

2015	0	0	0	0
2014	2	0	0	2
2013	4	0	0	4
2012	4	1	0	3
2011	4	1	0	3
2010	3	2	1	0
2009	3	1	0	2
2008	1	0	0	1
2007	7	2	1	4
2006	8	1	1	6
2005	4	0	0	4
	40	8	3	29

Benton

Year

2015	0	0	0	0
2014	6	1	1	4
2013	5	0	0	5
2012	2	0	1	1
2011	6	0	2	4
2010	5	0	2	3
2009	7	0	0	7
2008	4	0	1	3
2007	6	2	1	3

	2006	5	0	1	4
	2005	6	2	2	2
		52	5	11	36
	Franklin				
Year	2015	3	2	0	1
	2014	4	1	0	3
	2013	9	2	1	6
	2012	8	4	1	3
	2011	15	6	1	8
	2010	22	8	3	11
	2009	17	6	0	11
	2008	21	11	0	10
	2007	20	11	0	9
	2006	20	8	1	11
	2005	21	9	1	11
		157	66	8	83
	Adams				
Year	2015	0	0	0	0
	2014	3	0	1	2
	2013	0	0	0	0
	2012	3	0	1	2
	2011	1	0	0	1
	2010	3	0	2	1
	2009	2	0	1	1
	2008	3	1	0	2
	2007	3	0	1	2
	2006	2	0	1	1
	2005	6	1	1	4
		26	2	8	16
	Spokane				
Year	2015	2	0	1	1
	2014	16	6	2	8
	2013	22	8	4	10
	2012	16	1	0	15
	2011	16	4	3	9
	2010	23	5	1	17
	2009	29	4	3	22
	2008	28	6	5	17
	2007	24	5	3	16
	2006	28	8	2	18

2005	40	15	3	22
	242	62	26	154

Details for the 3 counties in the State of Idaho

IDAHO	Kootenai				
	Year	Total	Train	Highway	Other
	2015	0	0	0	0
	2014	5	2	2	1
	2013	11	0	3	8
	2012	7	0	3	4
	2011	7	1	0	6
	2010	8	0	2	6
	2009	11	2	2	7
	2008	11	0	3	8
	2007	14	0	8	6
	2006	12	1	5	6
	2005	19	3	4	12

	Bonner				
	Year	Total	Train	Highway	Other
	2015	0	0	0	0
	2014	6	1	0	5
	2013	5	0	3	2
	2012	8	3	1	4
	2011	3	0	1	2
	2010	2	0	0	2
	2009	6	1	2	3
	2008	9	2	1	6
	2007	4	0	1	3
	2006	9	3	2	4
	2005	4	2	0	2

	Boundary				
	Year	Total	Train	Highway	Other
	2015	0	0	0	0
	2014	5	2	2	1
	2013	2	1	1	0
	2012	2	0	0	2
	2011	5	0	3	2
	2010	1	0	0	1
	2009	4	1	1	2

2008	2	1	0	1
2007	2	1	0	1
2006	3	0	0	3
2005	4	2	1	1
	191	29	51	111

Details for the 9 counties in the State of Montana

MONTANA	Lincoln			
Year	Total	Train	Highway	Other
2015	0	0	0	0
2014	6	0	2	4
2013	0	0	0	0
2012	7	0	0	7
2011	6	2	0	4
2010	7	2	0	5
2009	3	0	0	3
2008	5	1	1	3
2007	2	0	0	2
2006	2	1	0	1
2005	7	0	2	5

	Flathead			
Year	Total	Train	Highway	Other
2015	0	0	0	0
2014	5	2	0	3
2013	9	1	0	8
2012	8	0	0	8
2011	18	5	1	12
2010	17	0	0	17
2009	18	4	3	13

2008	22	4	1	17
2007	20	1	2	17
2006	10	2	0	8
2005	14	4	1	9

Glacier

Year

2015	0	0	0	0
2014	1	0	0	1
2013	4	0	0	4
2012	4	0	1	3
2011	3	1	0	2
2010	7	1	1	5
2009	5	1	0	4
2008	5	2	1	2
2007	2	1	1	0
2006	4	2	0	2
2005	5	0	1	4
	226	37	18	173

Toole

Year

2015	0	0	0	0
2014	4	0	1	3
2013	5	2	0	3
2012	8	2	0	6
2011	9	1	0	8
2010	8	2	0	6
2009	9	0	0	9
2008	15	5	0	10
2007	6	0	1	5
2006	7	2	0	5
2005	3	1	0	2

Liberty

Year

2015	0	0	0	0
2014	0	0	0	0
2013	0	0	0	0
2012	1	0	1	0
2011	0	0	0	0
2010	0	0	0	0
2009	1	0	0	1
2008	3	1	0	2

2007	0	0	0	0
2006	1	0	0	1
2005	2	1	1	0

	Hill			
Year				
2015	1	0	0	1
2014	11	1	2	8
2013	11	3	0	8
2012	7	0	0	7
2011	13	2	0	11
2010	22	3	2	11
2009	18	1	1	16
2008	18	3	0	15
2007	18	2	0	16
2006	10	3	1	6
2005	9	1	0	8

	Blaine			
Year				
2015	0	0	0	0
2014	2	0	0	2
2013	1	0	0	1
2012	0	0	0	0
2011	0	0	0	0
2010	2	0	1	1
2009	2	0	1	1
2008	0	0	0	0
2007	3	0	1	2
2006	0	0	0	0
2005	0	0	0	0

	Phillips			
Year				
2015	0	0	0	0
2014	2	1	0	1
2013	2	1	0	1
2012	2	1	0	1
2011	6	1	2	3
2010	4	0	1	3
2009	2	0	0	2
2008	2	0	0	2
2007	3	0	1	2

2006	2	0	0	2
2005	0	0	0	0

Valley

Year

2015	0	0	0	0
2014	0	0	0	0
2013	3	0	0	3
2012	5	1	0	4
2011	9	3	0	6
2010	4	0	0	4
2009	5	0	0	5
2008	4	0	0	4
2007	5	0	0	5
2006	3	0	0	3
2005	2	0	1	1

Roosevelt

Year

2015	1	0	0	1
2014	7	2	1	4
2013	8	1	2	5
2012	7	1	2	4
2011	8	2	4	2
2010	9	4	1	4
2009	7	1	2	4
2008	3	0	0	3
2007	5	2	1	2
2006	6	0	0	6
2005	5	3	0	2

361	60	31	264
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Details for the 1 county in the State of North Dakota

NORTH DAKOTA

Williams

Year

2015	0	0	0	0
2014	19	2	3	14
2013	7	0	1	6
2012	7	0	3	4
2011	9	1	2	6

2010	9	2	2	5
2009	5	1	1	3
2008	7	2	1	4
2007	2	0	0	2
2006	4	1	0	3
2005	3	0	1	2

End of Comment #64 from 5.2-3 SEPA DEIS pdf 33/243

Comment #65 – Figure 5.3.6 Statewide Crossings Study on page 5.3-23 or page 63/243 is grossly inadequate and covers 44 rail crossings and omits many of the counties and cities of Washington State and is only part of the study area. Any and all analysis based on this data does not represent the status of the rail system related to the MBTL-Longview Coal Export Terminal and needs to be done more thoroughly prior to the final EIS Report. Page 5.3-23 SEPA DEIS pdf 63/243

Comment #66 – The existing port activity lacks meaningful data to move forward with the SEPA DEIS. The following is from this section:

<b>Port of Call</b>	<b>Number of Vessels – Some 2014 and Some 2015</b>
Astoria	230
Westward	Unknown
Longview	222
Kalama	205
Portland – See Note	352
Vancouver	450
Total	1,459 + Unknown
NOTE: Portland lost 161 Vessel when both container ship companies moved out in 2015	

More information for the most recent year 2015 and also historical for the past 5 years is the expectation in the report. This data is linked to allusions, collisions, stranding, spills, emissions, and other data. Based on this incomplete data, the No Action Alternative is recommended. Page 5.4-18 SEPA DEIS pdf 101/243

Comment #67 - Vessel size is a significant factor in transit planning. The River Pilots typically place just one pilot on each vessel, but in some circumstances, including vessels with a beam greater than 140 feet, two pilots are assigned. The type of cargo should have an influence on the number of river pilots besides the beam width. There are many types of cargo and weather conditions that would require more eyes. Page 5.4-23 SEPA DEIS pdf 105/243

Comment #68 - The list of types of vessels on the Columbia River do not document the United States Navy and “Fleet Week” in Portland Oregon related to the Rose Festival the second week in June from Wednesday through the following Monday. These are large ships that impact all other river traffic. Page 5.4-29 SEPA DEIS pdf 112/243

Comment #69 - A total of 151 incidents on the river for the period 2001 to 2014 does not speak very well for the numerous precautions, regulations and skills. With 3,600 transits annually or 50,400 for the 14 year period, the incident rate will only get worse with an additional 840 ships or 1,680 Transits Annually. Extrapolation could assume an additional 5 incidents a year related to the Millennium Bulk Terminals Longview Coal Export Terminal and this is unacceptable. Page 5.4-30 SEPA DEIS pdf 113/243

Comment #70 – It is just sloppy to show the Panamax and Handymax vessel sizes in meters and not in feet as in the rest of the report. This is confusing to many readers and inconsistent use of units of measure. Page 5.4-36 SEPA DEIS pdf 119/243

Comment #71 - **MM VS-2. Notify if Bunkering at Docks Occurs.** The risk of an oil spill at Docks 2 and 3 would primarily be during bunkering (refueling) operations. The Applicant has committed to no bunkering at Docks 2 and 3. If this changes and bunkering is proposed at Docks 2 and 3, the Applicant will notify Cowlitz County and Ecology who will determine if additional environmental review is required before bunkering operations are conducted. An enforceable Penalty or Bond of \$1,000,000 for the first time violation of the No Bunkering Rule would make this more effective. To make a recommendation only without enforcement allows operators to abuse the regulations as the Port Westward Crude oil Transit Terminal where volumes were significantly over the permitted. A \$1,000,000 penalty would be a wake up call in at least the Corporate Boardrooms. Page 5.4-47 SEPA DEIS pdf 130/243

Comment #72 – All the technical data on Noise does not reflect what the individual residents hear. I live 2,590 feet from the BNSF Tracks in a residential community of Felida and approximately 2,800 feet from the Columbia Shipping Channel and I hear the Rail noise of the trains and the horns at a nearby at grade crossing. Additionally I hear the Fog Horns on the River. If I can hear and be disturbed by the noise, then any and all residents closer are also impacted and not the numerical modeling data. Page 5.5-27 SEPA DEIS pdf 157/243

Comment #73 -

#### **Locomotives**

The impact analysis approach for rail operations used EPA-projected emissions factors for line-haul locomotives, which are based on projected changes in locomotive fleet over the next 30 years (U.S. Environmental Protection Agency 2009). These emissions were based on locomotive engine load and associated fuel consumption during transport to and from the coal export terminal, the unloading of coal from train cars, as well as the total annual coal throughput. It was assumed that all locomotives would use ultra-low-sulfur diesel (15 parts per million [ppm] sulfur).

#### **Vessel**

The impact analysis approach for vessel operations assumed that each vessel receiving coal would need three tugs to maneuver the ship, and would require 3 hours total time to assist with docking and departing operations. Further, it was estimated that an average of 13 hours would be needed to load each vessel with coal, and during this period of time, the vessel would be using auxiliary engines. To comply with International Maritime Organization 2016 Emission Control Areas for North America, all vessels were assumed to use the maximum allowed sulfur content marine distillate fuel of 0.1% (1,000 ppm). It was also assumed that all tugboats would use ultra-low-sulfur diesel (15 ppm sulfur).

The locomotive industry regulations have 5 tiers of NOX emissions and are not required to use ultra low emission diesel. Similar the marine vessels can be using the #6 Bunker Oil or “Bottom of the Barrel” and not adhere to marine distillate guidelines. This section needs to be fact checked. Page 5.6-7 SEPA DEIS pdf 169/243

Comment #74 – Coal dust is a form of particulate matter<sup>1</sup> and can affect air quality. Coal loaded onto trains consists of pieces and particles of differing size, including small particles, or dust. The vibration of the train during transit can break larger pieces of coal into smaller particles, creating more dust. Wind and air moving over the train may cause coal dust to blow off the rail cars, disperse, and settle onto the ground or other surfaces. Coal dust can also be created from the movement and transfer of coal at an industrial facility. The deposition of coal dust can be a nuisance and affect the aesthetics, look, or cleanliness of surfaces. This is the heart of the opposition to the MBTL-Longview Coal Export Terminal and is sufficient reason to consider the No Action Alternative for the Project. . Page 5.7 -1 SEPA DEIS pdf 184/243

Comment #75 –Coal dust toppers - For more information, see <http://www.bnsf.com/customers/what-can-i-ship/coal/include/dust-toppers.xls>

<b>APPENDIX B</b>		
<b>Acceptable Topper Agent and Application Rates</b>		
<b>Topper Agents <sup>(1)</sup></b>	<b>Concentration Rate per Railcar <sup>(2)</sup></b>	<b>Total Solution Applied per Railcar <sup>(3)</sup></b>
Nalco Dustbind Plus	2.0 gal	20 gal
Midwest SoilSement	1.25 gal	18.75 gal
AKJ CTS-100 <sup>(4)</sup>	1.36 gal	15 gal
AKJ DustLock <sup>(5)</sup>	1.14 gal	12.5 gal
Rantech Capture 3000	2.5 lbs	20 gal
MinTech MinTopper S+0150	1.1 gal	20 gal

**Nalco DustBind Plus Technology Makes Short List of Approved Over-the-Rail Topper Agents to Diminish Coal Dust in the Powder River Basin**

Nalco announced it has been approved by BNSF Railway as a supplier of car top binding agents (a.k.a. “topper”) to reduce coal dust releases.

Effective Oct. 1, 2011, BNSF has implemented a requirement for coal shippers in the Powder River Basin of Wyoming and Montana to reduce the loss of in-transit coal dust by at least 85 percent as compared to coal cars that have had no remediation measures. After an extensive seven-month testing period by BNSF that involved more than 1600 trains under real-world operating conditions, Nalco DustBind Plus Technology proved it can meet this dust mitigation requirement and is one of only three products included as a topper agent on the BNSF-accepted list.

DustBind Plus technology is a patent-pending, VOC-free, car topper agent with a freeze point of -20°F (-29°C). This is an advantage over other toppers that typically have a freeze point of 32°F (0°C) due to their high water content. The DustBind Plus agent forms a flexible, yet durable crust on the coal or mineral surface, providing dust control even as the material settles during transit.

Nalco formed the Global Mining and Mineral Processing Group in 1978, focused on the coal industry with dedicated sales, service, marketing and research teams. Nalco first provided solids

handling and dust mitigation in the Powder River Basin in 1983, expanding significantly over the years.

Nalco has a local presence in the Powder River Basin as well. DustBind Plus technology is manufactured at the Nalco facility in Casper, WY. Nalco Fab-Tech LLC, also in Casper, WY, custom designs and builds site-specific, robust equipment and systems for heavy industry. Fab-Tech systems are designed to ensure that DustBind Plus technology is properly applied and that the “topper” dust control program will be successful

This information does not identify what is in the dust topper agent or the distance needed for reapplication. With a \$26 Million Dollar Surfactant Application Facility in Pasco Washington, It is not known of reapplication is required and how often. More information is needed as this is only the fraction of what is really needed. Page 5.7 -3 SEPA DEIS pdf 186/243

Comment #76 -

<b>Table 5.7-2. Coal Dust Total Suspended Particulates Emissions Rates at Maximum Throughput Operation</b>	<b>Annual Average TSP Emissions Rate (tons per year)</b>
Coal pile wind erosion	1.08
Coal pile development and removal	2.62
Ship transfer and conveyors	5.25
Train unloading	0.91
<b>Total</b>	<b>9.86</b>

Notes:

TSP = total suspended particulates

The Scoping Comment Period at the Clark County Fairgrounds had a Millennium Worker make a 2 minute testimony in coveralls and hard hat showing that this is not clean operations based on his clothing. He recommended that this terminal not be built. He indicated this was from one half mile conveyor and is typical of the hazards that workers see every day. Recommend the No Action Alternative Page 5.7 -5 SEPA DEIS pdf 188/243

Comment #77 - In 2012, Washington State was responsible for contributing 92.0 million metric tons of CO2e. Of that 2012 total for Washington State, 42.5 million metric tons of CO2e (46.2%) are attributable to the transportation sector, and 12.1 million metric tons of CO2e (13.2%) are attributable to coal combustion in the electricity sector (Washington State Department of Ecology 2016).

One metric ton of CO<sub>2</sub> is released to the atmosphere for every 103 gallons of gasoline used. Using a car that gets 25 miles to the gallon, that’s just a bit more than 2,500 miles—about two months of driving for many Americans This implies that 6 metric tons CO2e is 15,000 miles driving

The entire state of Washington is equivalent to 2.3 E11 Miles per Year or with the distance of the earth to the moon at 238,900 miles this total Washington State CO2e at 92 MM Metric Tons per year is equal

to 962,745 one way trips to the moon. The No Action Alternative is recommended for this project. Page 5.8-8 SEPA DEIS pdf 219/243

Comment #78 The net annual emissions from the Proposed Action under the preferred 2015 Energy Policy scenario in 2028 would be 3.2 million metric tons of CO2e (Table 5.8-8). This is equivalent to adding about 672,100 passenger cars on the road each year (U.S. Environmental Protection Agency 2015b). The No Action Alternative is recommended as this is contributing to Green House Gas. Page 5.8-19 SEPA DEIS pdf 229/243

Comment #79 - Proposed Action-related Panamax ships would berth at two docks (Docks 2 and 3) to receive coal shipments. Panamax ships are midsized cargo ships, the largest that could fit through the Panama Canal prior to expansion. They have a capacity of 60,000- to 100,000-deadweight tonnage and require a draft of 42 to 49 feet. The depth of the Columbia River at the project area varies by season. If precipitation from snow and rain cause Columbia River water levels to decline, shipping could be restricted or more dredging could be required more frequently. Another reason to recommend the No Action Alternative. Page 5.8-31 SEPA DEIS pdf 241/243

**Comments on Chapter 6 – Cumulative Impacts**

Comment #80 –

<b>Table 6-1. Resources Potentially Contributing to Cumulative Impacts Section Chapter 3: Built Environment</b>	<b>Environmental Resource Area</b>	<b>Adverse Impacts Resulting from Proposed Action?</b>	<b>Potential for Cumulative Impacts?</b>
3.1	Land and Shoreline Use	Yes	Yes
3.2	Social and Community Resources	Yes	Yes
3.3	Aesthetics, Light, and Glare	Yes	Yes
3.4	Cultural Resources	Yes	Yes
3.5	Tribal Resources	Yes	Yes
3.6	Hazardous Materials	Yes	Yes
<b>Chapter 4: Natural Environment</b>			
4.1	Geology and Soils	Yes	Yes
4.2	Surface Water and Floodplains	Yes	Yes
4.3	Wetlands	Yes	Yes
4.4	Groundwater	No	No

4.5	Water Quality	Yes	Yes
4.6	Vegetation	Yes	Yes
4.7	Fish	Yes	Yes
4.8	Wildlife	Yes	Yes
4.9	Energy and Natural Resources	Yes	Yes
<b>Chapter 5: Operations</b>			
5.1	Rail Transportation	Yes	Yes
5.2	Rail Safety	Yes	Yes
5.3	Vehicle Transportation	Yes	Yes
5.4	Vessel Transportation	Yes	Yes
5.5	Noise and Vibration	Yes	Yes
5.6	Air Quality	Yes	Yes
5.7	Coal Dust	Yes	Yes
5.8	Greenhouse Gas Emissions and Climate Change <sup>a</sup>	Yes	Yes

It is interesting to note that of the 23 areas of study 22 have adverse impacts from the proposed actions as well as cumulative impacts. The only area missing is groundwater. Consider the impact of 30 years of coal related activities with the ground water about 10 feet below the surface in parts of the area. The coal is not a filter to clean up the ground water, but a adder of a multitude of toxic and hazardous pollutants in small concentrations that over time impact everything. When MBTL Longview Coal Export Terminal are applying 2,000 gallons per minute water to the facility for coal dust control, it can and will have an impact long term. Page 6-3 SEPA DEIS pdf 3/73

Comment # 81 – The 28 proposals and projects identified that are Reasonable Foreseeable Future Actions is factual as well as a future continuing fossil fuel proposals still on the drawing boards wanting to get to the West Coast. Many of these have and will continue to fail because of the following:

- A Strong Environmental Alliance in the Pacific Northwest
- Poor Marketing Skills by the Promoters
- Poor Management Teams
- Poor Financing
- Use of Antiquated and Obsolete Technology
- Limited payment of Tax Revenues to Local, State and Federals

- Urban Area Facilities
- Very Close to Waterways
- And Many More Reasons

The Pacific Northwest is blessed with clean air, clean water, good healthcare, fantastic recreational opportunities and a great place to call home. Why would you want to mess with this for all risk and little reward. Page 6-15 SEPA DEIS pdf 15/73

Comment #82 – The proposed cumulative 21,887 Annual Train Trips and 1,828 Annual Vessel Transits of both full and empty cargo from the proposed 28 proposed cumulative projects is very useful information. However, any and all of the trans- terminals are strictly financial middle man operations and not taking raw material directly to the processing facilities and are not needed. Similarly the proposed processing facilities are in general not for local consumption, but for global use. This list of cumulative proposals can be culled down to a very, very few real beneficial proposals that enhance the Pacific Northwest Values. . Page 6-17 SEPA DEIS pdf 17/73

Comment #83 –

The Crude Oil Rail Derailment in Mosier Oregon On June 3, 2016 where 4 rail cars caught fire and a total of 16 came off the tracks is still under investigation. The preliminary report is a broken clip holding the rail to the cross tie failed. This information is from news reports.

Thermal expansion of rail track is a great concern in this aging mode of transportation. In the past rails were 39 feet in length with a gap between rails that allowed for expansion and contraction. The rail cars went "Clickity - Clack" at each gap.

Now new rail systems are continuous welded rail (CWR) that are more subject to thermal growth and contraction.

A 1,000 foot CRW that has a 20 F Temperature Change from night to day grows 1.56 inches. On a hot day with repetitive rail traffic and sunshine the actual rail temperature can be 20 C or 68 F above ambient temperature making thermal growth even more challenging. In a typical 1,000 foot CRW this 68 F temperature change can result in thermal growth of 5.30 inches .

The two numbers are additive so 1.56 inches plus 5.30 inches equals 6.86 inches on a 1,000 foot length.

Consider also curves where the outside rail is longer than the inside rail and the problems get even worse.

Continuing this to a one mile section and the thermal growth is 35.67 inches or nearly a yardstick.

Derailments are not limited to crude oil unit trains but also include coal unit trains both which are very heavy and very long in length.

A 1,200 mile rail track from the coal mine or crude oil production field to the west coast terminal can have thermal growth of 3,567 feet or 2/3 of a mile.

It is all about math and physics with the coefficient of linear thermal expansion for carbon steel at 0.0000065 inches/degree/inch length .

All the parts of the rail system have to work 100 % correct or a derailment can and will occur. Rail temperatures in Washington State can be from -20 F in the high snow covered mountains to near 170 F in a hot sunny afternoon sunshine day.

Do your own calculations for this temperature change and then consider the No Action Alternative for this Coal Project.

The rail systems in the pacific northwest were built 125 years ago for passenger and short haul timber, Not for the 125 car unit trains of heavy loaded rail locomotives and rail cars.

This will keep you awake at night – 3,000 rail cross ties per mile of track with 24,000 rail spikes built on a rail bed constructed 125 years ago around 1890.

The No Action Alternative is the Only Option at this point. Page 6-17 SEPA DEIS pdf 17/73

Comment #84 – At Grade Rail Crossing have and always will be of concern for routine and emergency traffic. If it is you or a loved one on the wrong side of the tracks in an emergency, the emergency vehicle has to cross the tracks twice and bottom line is people die, capital investments are lost, familys are segmented, and on and on. No Action Alternative is recommended as the final decision is not about money but a potential 100 year proposal to Trans Load Domestic Coal to International Markets. Washington is the “Evergreen State” - for the past 126 years – May It Always Be So. Page 6-45 SEPA DEIS pdf 45/73

Comment #85 - Table 6-14. Projected Rail Traffic at Statewide Study Crossings in 2038 has 44 rail crossings and fails to include Clark County Washington and also the Many, Many , Many at grade rail crossings in Washington State that are impacted by the proposed facility. Page 6-52 SEPA DEIS pdf 52/73

Comment #86 – It would be interesting to have a comparison of the jobs related to recreational fishing on the Columbia River with the Direct and Indirect employees. This compared to the proposed MBTL Longview Coal Export Terminal with 130 Direct Jobs and 1,300 Construction Jobs. Fish are better to eat than a Lump of Coal. Page 6-59 SEPA DEIS pdf 59/73

Comment #87 - The 2015 transportation package passed by the Washington State Senate includes \$85 million to construct the preferred alternative identified after the conclusion of the NEPA and SEPA processes. If the project grade-separates the Oregon Way and/or Industrial Way crossings of the Reynolds Lead, freight trains on the Reynolds Lead would not be required to sound train horns for public safety, which would decrease rail-related noise levels at these crossings. This is a lot of taxpayer money to avoid rail horn noise. NO ACTION ALTERNATIVE Page 6-61 SEPA DEIS pdf 61/73

Comment #88 - Table 6-21. Estimated Maximum PM10 and PM2.5 Concentrations—BNSF Main Line in Cowlitz County. Many pages were devoted to indicate that coal dust was not a problem and yet this table indicates PM2.5 is exceeded in 24 hour and annual rates. Thank You for making the honest interpretation of the facts. Coal Dust is harmful and more will be released in the Environmental health Assessment report. Recommend the No Action Alternative Page 6-67 SEPA DEIS pdf 67/73

Comment #89 –

<b>Table 6-24. Estimated Average Maximum and Maximum Monthly Coal Dust Deposition—BNSF Main Line in Columbia River Gorge Distance (feet)</b>	<b>Average Maximum Monthly Deposition (g/m<sup>2</sup>/month)</b>	<b>Maximum Monthly Deposition (g/m<sup>2</sup>/month)</b>	<b>Trigger Level for Sensitive Areas (g/m<sup>2</sup>/month)<sup>a</sup></b>
100	<b>4.0</b>	<b>4.6</b>	2.0
150	<b>2.7</b>	<b>3.4</b>	2.0
200	1.9	<b>2.6</b>	2.0
250	1.5	2.0	2.0

Notes:

<sup>a</sup> **Bolded, shaded gray** indicates an estimated deposition would be higher than the trigger level for sensitive areas.

<sup>b</sup> Source: New Zealand Ministry of Environment 2001

g/m<sup>2</sup>/month = grams per cubic meter per month

I would suggest doing the math to US Units of Tons per Square Yard per Month instead of grams per cubic meter per month. The use of Metric and US Units back and forth just adds to the complexity and confusion to the reader of the document. The Bottom Line Question is “How many Tons of Coal Dust are deposited along the tracks from the mine to the terminal by using open top rail cars in a 30 year period of the proposed Longview Coal Export Terminal for the Columbia Gorge National Scenic Area. Continue to the remainder of the areas and result will be what is the impact to the entire system. No Action Alternative is Recommended Page 6-69 SEPA DEIS pdf 69/73

Comment #90 - The coal market assessment found that the operation of the planned coal export terminals in Table 6-27 would increase the domestic coal prices and decrease domestic coal consumption, resulting in a decrease in domestic greenhouse gas emissions. Natural gas consumption would increase as it would be used as a substitute for coal. Therefore, the net domestic greenhouse gas emissions would decrease. However, internationally, Asian coal displacement coupled with induced demand<sup>11</sup> from reduced international coal prices would outweigh any reduction in domestic emissions and would result in an increase in international greenhouse gas emissions. Induced demand under the Cumulative Proposed Action scenario would be higher than the Past Conditions (2014) scenario<sup>12</sup> due to the effects of all coal export terminals.

<b>Table 6-28. Total Net Greenhouse Gas Emissions in 2038 for the Cumulative Proposed Action Scenario<sup>a</sup> Area</b>	<b>Net Emissions (Million Metric Tons CO<sub>2</sub>e)</b>
Cowlitz County	0.038
Washington State	0.290
United States	-24.4

Internationalb 86.9

**Total 62.5c**

Notes:

a Net emissions compared to the Cumulative No-Action scenario (i.e. no coal export terminals)

b Outside the United States

c United States plus International

CO<sub>2e</sub> = carbon dioxide equivalent

There is every reason to consider the No Action Alternative for the MBTL- Longview Coal export Terminal. We Can Do Better. Page 6-71,72 SEPA DEIS pdf 71,72/73

### Comments on Chapter 7 – Public Involvement

Comment #91 – The Scoping Period indicates the following data:

- 217,566 total comments received
- 3,000 Unique Submissions
- 2,000 substantive text
- 127 Agency and Tribal Submissions

We the People have Spoken at Mosier Oregon Recent train derailment – We are farmers of the river, farmers of the sea, farmers of the land, and we have been since time immemorial," said Jay Julius, a member of the Lummi tribal council. "The fish always returned because we gave them great respect. Where are we at today?" (Columbian 6-9-16)

The No Action Alternative is Recommended Page 7-5 SEPA DEIS pdf 5/8

### Comments on Chapter 8 – Required Permits

Comment #92

**Table 8-1. Required Plans, Permits, and Approvals Plan / Permit / Approval**

**Local**

Shoreline Substantial Development Permit

**Jurisdiction / Agency**

Cowlitz County

Shoreline Conditional Use Permit

Cowlitz County

Critical Areas Permit

Cowlitz County

Floodplain Permit

Cowlitz County

Building and Site Development Permits

Cowlitz County

Wastewater Discharge Permit

Three Rivers Regional Wastewater Authority

Utility Service Permit

City of Longview

Notice of Construction	Southwest Clean Air Agency
<b>State</b>	
Clean Water Act Section 401 Water Quality Certification	Washington State Department of Ecology
National Pollutant Discharge Elimination System Construction Stormwater General Permit	Washington State Department of Ecology
National Pollutant Discharge Elimination System Industrial Stormwater Permit	Washington State Department of Ecology
Stormwater Pollution Prevention Plan	Washington State Department of Ecology
Water Rights Permit	Washington State Department of Ecology
Shoreline Conditional Use Permit	Washington State Department of Ecology
Hydraulic Project Approval	Washington Department of Fish and Wildlife
<b>Federal</b>	
Clean Water Act Section 404 Permit	U.S. Army Corps of Engineers
Rivers and Harbors Act Section 10 Permit	U.S. Army Corps of Engineers
Section 106 of the National Historic Preservation Act	U.S. Army Corps of Engineers
Endangered Species Act Consultation	U.S. Fish and Wildlife Service and National Marine Fisheries Service
Marine Mammal Protection Act	National Marine Fisheries Service

The 8 Local Permits, 7 State Permits and 5 Federal Permits are not required when you issue the NO Action Alternative for this Millennium Bulk Terminals – Longview Coal Export Terminal and the project is dead. The Public will continue to challenge the 20 permits. Page 8-1 SEPA DEIS pdf 1/1