



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**  
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June 13, 2016

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

**RE: Department of Fish and Wildlife Comments on the Millennium Bulk Terminals - Longview DEIS**

To Whom It May Concern:

Thank you for the opportunity to comment on the Millennium Bulk Terminals-Longview Draft Environmental Impact Statement (DEIS). We understand the importance of this decision-making process and offer comments based on potential impacts to fish and wildlife resources. We will break down our comments into four subject areas:

1. Increased rail traffic impacts,
2. Increased vessel traffic impacts,
3. On-site construction impacts, and,
4. Climate change

As you know, a decision of this magnitude has many long-lasting implications for the natural resources and socio-economics of this region. Our agency promotes the numerous benefits healthy ecosystems provide to our statewide economy.

The Columbia River sustains a major commercial and recreational fishery of international importance, and provides many local jobs to industries that depend on its scenic, cultural, and recreational benefits. We understand the delicate balance that decision-makers must strike in order to ensure that all factors that affect Washington's quality of life are considered. We hope you will find the attached comments helpful in informing this decision-making process.

If you have any questions about this correspondence, please contact Dave Howe at (360) 906-6729.

Sincerely,

Guy Norman  
Regional Director  
Washington Department of Fish and Wildlife

### **Increased Rail Traffic Impacts**

We thank the applicant for the analysis of impact to wildlife due to increased rail traffic and coal transport. The study concludes that at full buildout in 2028, the project proposes to increase rail traffic by an additional 16 trains/ day. Section 5.1.8 states:

“Without improvements to increase capacity, the Reynolds Lead; BNSF Spur; and three segments on 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 the projected 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 potential baseline rail traffic in 2028, the Proposed Action could result in a significant adverse environmental impact on rail transportation.”

This study does not contemplate what these capital improvements may be or where they may occur. Southwest Washington has had a history of rail improvements that have impacted category 1 wetlands, and high functioning, fish bearing rivers and streams. The potential significant adverse environmental impact of a rail buildout to support operations is a topic that requires more research at this phase of the proposed project.

The document includes references to the likely increase in wildlife strikes associated with the increased rail traffic. However, the plan addressing or monitoring this impact is lacking clarity. Currently, this section recommends monitoring for train/wildlife strikes, monitoring the population level impact of these strikes, and at a later undefined date, possibly implementing mitigation. Specifically, section 4.8.7.2 should include more robust language, and a detailed discussion regarding mitigation that addresses avoidance, minimization, and compensatory mitigation as necessary.

While this section addresses several wildlife impacts, there is limited information regarding the loss of connectivity, disturbance, and landscape barrier impacts that the rail lines have on the environment. This impact should be more adequately recognized and appropriate mitigation strategies should be designed as part of project approval, not at an undefined time in the future.

### **Increased Vessel Traffic Impacts**

Vessel traffic impacts are a significant portion of the proposed project activity, and subsequently have a large potential impact on aquatic species. We would like to thank the applicant for the thorough impact assessment for increased vessel traffic impacts to aquatic species. Section 5.4.5.1 states:

“The Proposed Action would 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. At maximum throughput, an average of 70 vessels per month (an average of over two per day) would be loaded at Docks 2 and 3. The berths for Docks 2 and 3 are expected to be occupied by Proposed Action-related vessels 365 days per year. Increased vessel traffic could result

in changes in wake patterns, increased propeller wake, and increased underwater noise, and vessel emissions that could affect other environmental resources. In general, the increase in deep-draft vessels associated with the Proposed Action would result in the increased potential for vessel-related impacts to occur.”

While this document contains a vast amount of information, the potential impacts are unclear. The impacts from wake stranding throughout the lower Columbia River are growing in clarity, as has mitigation deemed necessary for such impacts. Due to the environmental, social, recreational and economic impacts that vessel traffic could have on the region, the agency recommends additional analysis on wake stranding and the daily number of ships on-site both berthing and anchored. In addition, greater impacts to commercial fisheries should be analyzed including mainstem and Select Area Fisheries Evaluations, experimental fisheries and recreational fisheries in the proximate area.

The study area proposed should be expanded to include the Washington coast expected to be traveled by cumulative vessel and rail traffic during operation of the proposed project. Although the DEIS discusses the potential impact on pinnipeds in the Columbia River, it fails to include any analysis of increased potential for impacts on cetaceans caused by increased vessel traffic after they leave the river and enter the Pacific. It is well known that the Columbia River Bar is one of the most dangerous shipping channels on the west coast. Daily crossings of the bar during storms can pose risks not only to vessels, but to the estuary environment if there is a spill. A spill of this type could be difficult to entirely contain due to challenging maritime conditions in the area. The estuary is an important nursery and foraging area for a myriad of fish and wildlife species. Expansion of the study area will allow for more accurate projected impacts to Marine Protection Zones, the outer Washington coastline and designated vessel routes; allowing for more improved understanding of overall cumulative impacts to species and their habitat.

### **On-site Construction Impacts**

We would like to thank the applicant for the thorough impact assessment for construction and operation impacts to aquatic species at the project site. Section 4.7.5.1 explains project-related activities and their direct or indirect impact to aquatic species.

Upon review of the “Fish Fact Sheet” in comparison with this section, there is disagreement in the number of proposed pilings, from 610 to 630 on-site. Please provide clarity on specifics such as these pilings in future documents so impacts may be concluded and mitigated properly. The siting of this facility is a topic that the agency requests more information on. This is due to our lack of clarity on the analysis on location of the terminal and potential alternatives. A concise analysis on the terminal location’s impacts to mitigation sequencing, migration corridors, impacts to fish life and aquatic vegetation, and siting that it is in deep water areas to avoid and/or minimize the need for dredging is requested.

On-site impacts can be minimized with a concise in water work window for construction. The agency requests discussion on setting the in water work window, and offers consultation on this topic as the project staging continues. In addition, we support the removal of creosoted pilings by vibratory hammer as proposed.

Dredging activities throughout the lower Columbia River are providing further insight on both short and long term impacts to aquatic environments and species. For example, in water disposal for clean material is the preferred method as expressed by the agency. We do recommend a more robust study of cumulative impacts on dredging in the Lower Columbia River as part of the proposed project impacts to the region.

Specifics on topics such as initial dredging, and maintenance dredging intervals and quantities, as well as a study on slope instability in regards to regrade and expansion of the dredge area; these are important pieces in the determination of impacts and responsible mitigation. We request more information on the topics of dredging on-site and its larger cumulative impacts on the region in the formation of a mitigation package. The department offers consultation on the determination of appropriate mitigation.

On-site construction and development are discussed appropriately in Section 4.8. The documents underplay however the loss of available habitat by the destruction of 24 acres of productive wetland on the project site, which is host to a diverse host of species and ecological communities important to the area and region. This includes the great pacific flyway, a corridor for migrating birds. An analysis on the impacts above and beyond avoidance and minimization is requested in order to effectively discuss mitigation needs for the impacts to species and environments from on-site construction.

### **Climate Change**

Section 5.8.2.4, page 5-8-25 adequately describes projected impacts from climate change, but focuses almost exclusively on economic impacts to the region. The one exception seems to be the paragraph on ocean acidification, which acknowledges the potentially significant effect on shellfish and other organisms. WDFW recommends including a more robust discussion of the impacts climate change will have on the fish and wildlife of Washington, as well as the important economic value it serves our state and region. Climate impacts are expected to affect ecosystems, species and habitats in at least six key ways. These include the degradation and loss of habitat, increase in major ecosystem disturbances, shifts in geographical ranges of some native plants and animals, change in timing of life history events for species, declines in species population and the loss of biodiversity, and the spread of invasive species and disease. These impacts have large ramifications for our region's social, economic and environmental viability in the future. WDFW suggests referencing "[State of Knowledge Report: Climate Change Impacts and Adaptation in Puget Sound](#)", prepared by the Climate Impacts Group in 2016 in further analysis of this topic and the discussion appropriate mitigation for project impacts.