

June 8, 2016



Millennium Bulk Terminals EIS  
Attention: ICF International  
710 Second Avenue, Suite 550  
Seattle, WA 98104

RE: Draft EIS for Millennium Bulk Terminals-Longview

Thank you for the opportunity to comment on the Millennium Bulk Terminal Draft EIS. I am submitting this letter on behalf of the Pacific Northwest Waterways Association (PNWA). PNWA is a non-profit trade association that advocates for federal policies and funding in support of regional economic development. We represent over 130 public and private sector member organizations in Oregon, Washington, and Idaho. Members include public ports, navigation, transportation, trade, tourism, agriculture, forest products, energy and local government interests. Since our founding in 1934, PNWA led the way for development of economic infrastructure for navigation, electric power and irrigated agriculture on the Columbia Snake River System. In 1971, we expanded, adding Oregon and Washington coastal port members to provide a comprehensive regional perspective. Today, PNWA works with the U.S. Congress, federal agencies and regional decision leaders on transportation, trade, energy and environmental policies and projects to enhance economic vitality in the Pacific Northwest. A full list of our membership is attached to this letter.

In fall 2010, the Columbia River navigation channel deepening project was completed, bringing the federal channel depth from 40 to 43 feet. The channel deepening authorization included extensive analysis by the U.S. Army Corps of Engineers and was undertaken to prepare the river for larger vessels with the goal of attracting new projects, increasing cargo movement out of our region and reducing transportation costs. Channel deepening has already resulted in over \$1 billion dollars of public and private investment in the scant six years since it was completed.

The Columbia Snake River System is a 470 mile transportation link from the Pacific Ocean to Idaho. It is the nation's number one wheat export gateway and number two for soy. It is also the number one West Coast gateway for wood and mineral bulk products. Over \$24 billion of cargo moved on the Lower Columbia in 2012, directly supporting over 40,000 local jobs, and we are poised to handle more cargo than ever before.

PNWA is supportive of thorough and fair reviews of all new projects on the river system, and we are concerned about the study's expanded scope. The study's inclusion of recommendations for mitigation of greenhouse gas emissions occurring outside of Washington State sets a concerning precedent for future development. The out of state emissions are not caused by the operation of the terminal, and are not within the Project's control. Should this criteria be included in other project permitting decisions, the resulting mitigation requirements will make the State of Washington uncompetitive with other port systems and threaten commodity movements and investment across the region. We suggest that the study area be limited to the State of Washington as has historically been the case for similar marine terminal developments.

[www.pnwa.net](http://www.pnwa.net)

As a major bulk export gateway, the Columbia Snake River System exports a wide variety of cargos and serves as a major international trade gateway for our nation. Cargo from the heartland of our country is routinely moved by rail or barge to the lower Columbia River for export. Navigation interests along the river system are committed to increasing these exports, ultimately bringing jobs, tax revenue and economic development to the region. Vastly expanding the regulatory scope creates uncertainty for future projects and undermines the efficiencies of the river system and the global competitiveness of our region.

Finally, PNWA is concerned at the length of review and permit processing time. The increased cost and uncertainty of permitting projects is becoming an increasingly severe burden on businesses and raises the cost of investing in the region and the river system. We respectfully request that the review and finalization process for the EIS is expedited to minimize the elapsed time between submission of permit applications and the issuance of a completed EIS.

Thank you for the opportunity to provide comment.

Sincerely,

*Kristin Meira*

Kristin Meira  
Executive Director  
Pacific Northwest Waterways Association

# PNWA Membership Roster



Advanced American Construction  
Almota Elevator Company  
American Waterways Operators  
Apollo Mechanical Contractors  
Barney & Worth  
Bell Buoy Crab Co.  
Bellingham Cold Storage  
BergerABAM Engineers, Inc.  
Bergerson Construction, Inc.  
BNSF Railway Company  
BST Associates  
Business Oregon Infrastructure  
Finance Authority  
Central Oregon Basalt Products  
Central Washington Grain Growers  
Clark Public Utilities  
Clearwater Paper Corporation  
Collins Engineers Inc.  
Columbia Basin Development  
League  
Columbia County Grain Growers  
Columbia Grain  
Columbia River Bar Pilots  
Columbia River Pilots  
Columbia River Port Engineers  
Columbia River Steamship  
Operators Association  
Columbia River Towboat  
Association  
Cooperative Agricultural Producers  
Dawson & Associates  
David Evans and Associates  
Dunlap Towing  
East Columbia Basin Irrigation  
District  
Ecological Land Services  
EGT, LLC  
Evergreen Engineering  
Foss Maritime Company  
Foster Pepper  
Franklin PUD  
Gibbs & Olson, Inc.  
Global Partners LP  
Gordon Thomas Honeywell  
Great Lakes Dredge & Dock  
Hart Crowser, Inc.  
Idaho Wheat Commission  
ILWU Oregon Area District Council  
ILWU Puget Sound District Council  
Jessie's Ilwaco Fish Co.

J-U-B Engineers, Inc.  
Kalama Export Company  
Kiewit Infrastructure West Co.  
KPFF Consulting Engineers  
Lampson International, LLC  
Landau Associates  
Lewis-Clark Terminal Association  
Louis Dreyfus Commodities  
Marine Industrial Construction  
McGregor Company  
Millennium Bulk Terminals  
Moffatt & Nichol  
Morrow County Grain Growers  
Morrow Pacific Project  
Normandeau Associates, Inc.  
Northwest Grain Growers, Inc.  
Northwest Public Power Assoc.  
OBEC Consulting Engineers  
OR Public Ports Association  
OR Wheat Growers League  
Pacific Northwest Farmers Co-op  
Pacific Northwest International  
Trade Association  
Parsons Brinckerhoff  
PBS Engineering & Environmental  
PND Engineers, Inc.  
PNGC Power  
Pomeroy Grain Growers  
Port of Anacortes  
Port of Astoria  
Port of Bandon  
Port of Bellingham  
Port of Benton  
Port of Camas-Washougal  
Port of Cascade Locks  
Port of Chelan County  
Port of Chinook  
Port of Clarkston  
Port of Columbia County  
Port of Coos Bay  
Port of Everett  
Port of Garibaldi  
Port of Gold Beach  
Port of Grays Harbor  
Port of Hood River  
Port of Ilwaco  
Port of Kalama  
Port of Klickitat  
Port of Lewiston  
Port of Longview

Port of Morrow  
Port of Newport  
Port of Pasco  
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Port of Portland  
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Port of Royal Slope  
Port of Seattle  
Port of Siuslaw  
Port of Skagit  
Port of St. Helens  
Port of Sunnyside  
Port of Tacoma  
Port of Toledo  
Port of Umatilla  
Port of Umpqua  
Port of Vancouver  
Port of Walla Walla  
Port of Whitman County  
Port of Woodland  
PROCESS, Inc.  
Puget Sound Pilots  
RSEC Environmental & Engineering  
Consulting, Inc.  
Schwabe, Williamson & Wyatt  
Scouler Company  
SDS Tug & Barge  
Shaver Transportation Company  
Stoel Rives LLP  
Summit Strategies  
Teevin Bros.  
TEMCO  
Tidewater  
United Grain Corporation  
USA Dry Pea & Lentil Council, Inc.  
Vancouver Energy  
Van Ness Feldman  
WA Association of Wheat Growers  
WA Council on International Trade  
WA Grain Commission  
WA Public Ports Association  
WA State Potato Commission  
Westwood Shipping Lines  
Whole Brain Creative  
Wildlands, Inc.  
Willamette Falls Locks Working  
Group