



June 13, 2016

**RE: Millennium Bulk Terminals Longview Draft SEPA EIS**

Environmental Reviewing Agencies:

On behalf of the Port of Longview (Port), thank you for the opportunity to comment on the Draft SEPA Environmental Impact Statement (EIS) for the Millennium Bulk Terminals Longview proposal. The Port of Longview is a public port operating upriver of Millennium, as well as an adjacent land owner of undeveloped, industrial property down river of the proposed terminal.

Unfortunately, in the Draft SEPA EIS Section 5.1 evaluation there does not appear to be tangible mitigation measures proposed in *Applicant Mitigation* (5.1.7.1) or in *Other Measures to be Considered* (5.1.7.2) that adequately provides for known and cumulative impacts. The mitigation proposed only speaks to participation and notification of the Millennium phasing and a report, but does not require anything further.

Existing transportation corridors connect the Port to international markets for the economic benefit of our community, state and nation. As a cargo transfer facility, we rely on river, rail and road connections to efficiently move cargo around the world. With dozens of existing industries and customers relying on current levels of transportation service, it is vital the EIS account for Millennium's impacts of increased river and rail traffic on existing users dependent on current levels of transportation service.

The increase of 16 trains at full build out will significantly impact community vehicular traffic at multiple at-grade crossings, as well as current and future industrial rail users. To accommodate existing users and in anticipation of growth in Longview's industrial area, improvements are underway to improve the road/rail interface along the SR432 corridor – improvements that will directly benefit this proposed project. Financial support of transportation projects along the corridor would be an appropriate form of mitigation for increased rail traffic along the route.

Additionally, impacts to the existing limitations on the single track BNSF Cowlitz River Rail Bridge crossing

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T. 360-425-3305  
F. 360-425-8650

10 PORT WAY  
LONGVIEW, WASHINGTON 98632

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should be mitigated through participation and/ or funding for a future study and construction of improvements for this crossing.

As vital as rail infrastructure is our reliance on navigation infrastructure on the Columbia River. Currently, large bulk vessels calling on the river utilize stern buoys to ensure safe anchorage while awaiting berth or sailing. The lower Columbia River ports have worked aggressively to increase, and fund, the existing stern buoys available on the river to accommodate current customers and levels of vessel traffic. With Millennium's proposed increase in vessel traffic, costs of stern buoys and river infrastructure projects should be proportionally funded by private projects like this instead of relying solely on public financing.

As a public port, we are interested in how proposals are permitted throughout the State of Washington. We appreciate that projects are required to navigate through some of the strictest of state regulations, as well as federal regulation interpretations, within the United States. This, of course, provides our State with an environmental quality of life envious to others. However, analysis of greenhouse gas and climate change impact on freight infrastructure and operations across state lines will significantly and negatively impact reasonable economic development through the most trade dependent state in the nation. This new evaluation formula sets precedence that the State may not be able to retract from.

While the EIS process can be lengthy and often require extensive mitigation, we hold the belief that the environmental impact scoping and analysis process, if conducted according to its reasonable geographical and legal parameters, is a process that works.

Best Regards,

A handwritten signature in blue ink that reads "Jeff & Norm Krehbiel". The signature is written in a cursive style.

Norm Krehbiel  
Interim CEO