

4402 Y Road
Bellingham, Washington 98226

June 13, 2016

Cowlitz County Department of Building and Planning

Washington State Department of Ecology

Re: DEIS, Millenium Bulk Terminals at Longview

Dear Co-Lead Agencies:

Please accept the following comment letter on the proposed Longview coal terminal. I acknowledge the stupendous effort you and your staffs have put into the EIS; it is much appreciated. I do have a few comments to offer on the EIS.

Chapter 2 P. 15. This section reports peak water usage estimates for the terminal but does not report average or yearly estimated water consumption. The EIS should do so, because long-term consumption and discharge are equally relevant figures for public sector water planning. This discussion should be related to the discussion of climate change in chapter 5.8.

Chapter 2 P. 18. Pre-loading aggregate: only the sketchiest outlines of this process have been included. The EIS needs to be specific about what kinds of material will be obtained, where from, how much diesel smoke will be generated in moving it with 753 barges the first year, noise and air pollutants to be generated over several years in the process of moving the material around the site from one pad to another, effects on communities through which the aggregate will have to pass. This will be a massive, prolonged, and devastating disruption to the Longview and neighboring communities. Its effects should not be minimized.

The EIS estimates up to 70 vessels per month will visit the site at full build-out. This means 140 new ship transits per month from the Columbia River Bar up to Longview – not counting the two or three tugs assigned to ship assist work every time a cargo carrier arrives or departs. Chapter 5.4 p 34 runs these numbers out to yearly, 1,680 ship transits. Most of these ships will be Panamax class, 100,000 deadweight tons and up, drawing 49.' This is a huge negative qualitative and quantitative impact on current river traffic that cannot be mitigated. The EIS p. 5.4-38 identifies known difficulties berthing cargo ships at Dock 1, but says there is no way to evaluate the difficulty without building the terminal and finding out by trial and error. This is not an acceptable or satisfactory planning approach. Cargo ship movements will dominate river traffic to the virtual exclusion of other traffic. The EIS needs to put this impact into some comprehensible terms for the lay reader rather than burying it in statistics or masking it as indirect impact.

Risk of bunkering fuel spills is highly contingent on human error. This risk cannot be reduced to zero, best practices notwithstanding. 5.4-44. The status of bunkering at Dock 1 is not clear, or at least I could not find it.

5.5-2 noise and trespass light from anchored or docked ships: they run generators 24/7. This source of noise and trespass light should be assessed in the EIS. So should mitigation measures, such as darkening ships after sundown and using full-cutoff lighting on deck (per International Dark Sky Association standards).

Coal dust mitigation 5.7-26 no mention of covered coal cars, an obvious mitigation measure for coal dust suppression. The EIS needs a discussion of its feasibility, and if it is not feasible, why not.

Thank you for considering my comments.

Sincerely,

Peter Willing