



United States Department of the Interior



FISH AND WILDLIFE SERVICE

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In Reply Refer To:
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Millennium Bulk Terminals – Longview SEPA EIS
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Subject: Public Notice and Draft Environmental Impact Statement
Millennium Bulk Terminals Longview Coal Export Terminal

On April 29, 2016, Cowlitz County and the Washington State Department of Ecology (DOE) announced the release of a Draft Environmental Impact Statement (EIS) for the Millennium Bulk Terminals Longview Coal Export Terminal (Millennium Longview Coal Terminal). Millennium Bulk Terminals – Longview, LLC (the Applicant) proposes to construct and operate, for a term of approximately 30 years, a 44 million metric ton per year coal-by-rail marine terminal located on the lower Columbia River near Longview in unincorporated Cowlitz County, Washington. The DOE and Cowlitz County, acting as the Washington State Environmental Policy Act (SEPA) co-leads, have requested comments for the Draft EIS by June 13, 2016.

The U.S. Fish and Wildlife Service (Service) has responsibility for managing or co-managing a variety of federal trust resources, including sensitive species which are listed under the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*)(ESA), their habitats and designated critical habitat, federal wildlife refuges, and other fish and wildlife trust resources. Within the study area, including the rail and marine vessel transport routes in Washington (which include more than 320 linear miles of the middle and lower Columbia River), these trust resources include the following: 1) bull trout (*Salvelinus confluentus*, threatened; Coastal and Mid-Columbia Recovery Units), 2) Columbian white-tailed deer (*Odocoileus virginianus leucurus*, endangered), 3) streaked horned lark (*Eremophila alpestris strigata*, threatened), 4) designated critical habitat for the bull trout and streaked horned lark, 5) numerous candidate

species and species proposed for listing (e.g., northern wormwood, *Artemisia borealis* var. *wormskioldii*; Washington ground squirrel, *Uroditellus washingtoni*), 6) several National Wildlife Refuges and federally administered fish hatcheries, 7) shorebird, waterfowl, and migratory bird populations (including habitats of great importance to the entire Pacific flyway), and 8) jointly managed Tribal, commercial, and recreational fisheries.

The Service is also committed to implementing the goals, objectives, and policy principles outlined in our Native American Policy (USFWS 2016a) and Secretarial Order 3206 (U.S. Department of the Interior and U.S. Department of Commerce, 1997). The Service shares in the federal government's responsibility for accomplishing greater recognition and protection of treaty-protected resources and rights.

The current proposal includes one operating rail track, eight additional tracks or sidings for storing rail cars, rail car unloading facilities, a stockyard and coal storage area, conveyors and reclaiming facilities, two marine terminal docks, and ship loading facilities. The proposed coal export terminal would receive coal from Colorado, Montana, Utah, and Wyoming via rail shipment (BNSF Railway Company and Union Pacific Railroad). Coal would be loaded and transported by ocean-going vessels via the Columbia River and Pacific Ocean to overseas markets in Asia. The current proposal includes the following (Cowlitz County and DOE 2016; Summary, pp. S-1 through S-8):

- Maximum annual throughput of approximately 44 million metric tons of coal per year.
- At maximum throughput, an average of approximately eight (8) loaded unit trains per day; a maximum of approximately 5,840 one-way unit train trips per year.
- At maximum throughput, at least 2 vessel calls per day (an average of 70 vessel calls per month); a maximum of approximately 1,680 vessel transits per year.

Thank you for the opportunity to review and offer comments for the Draft EIS, and for holding the related public meetings and hearings in Longview, Spokane, and Pasco, Washington. This letter transmits the Service's comments and concerns regarding the current proposal, the Draft EIS, and the unavoidable and significant adverse impacts which have been acknowledged by the SEPA co-leads.

The Service has significant concerns regarding the foreseeable impacts of the Millennium Longview Coal Terminal project. The Service believes that the current proposal would have adverse impacts to fish, wildlife, and tribal trust resources. Content included in the Draft EIS suggests that the Millennium Longview Coal Terminal project would have unavoidable and significant adverse impacts, as defined under SEPA, to Tribal Resources, Social and Community Resources, Water Quality, Rail Safety, Air Quality, and Greenhouse Gas Emissions and Climate Change (Cowlitz County and DOE 2016; Summary, pp. S-10 through S-58). Combined with other impacts from past, present, and reasonably foreseeable future actions, the Millennium Longview Coal Terminal project would have additional, significant and adverse cumulative impacts. The Service believes that the SEPA co-leads should recommend against approval of this proposed facility/project.

Cowlitz County and the DOE received over 200,000 comments for the proposed action during the scoping period. Many of these comments expressed concern for aquatic resources, and the potential for damage to aquatic ecosystems, fisheries, and fishing areas on the Columbia River; damage to human health and natural resources from coal dust and diesel emissions; and, toxic air pollution, greenhouse gas emissions, and resulting damage to the global climate system.

Nine Native American Tribes, Tribal Nations, and tribal organizations provided comments to Cowlitz County, the DOE, and/or the U.S. Army Corps of Engineers (Cowlitz County and DOE 2014; Scoping Summary Report, pp. 4-1 through 4-5): the Coeur D'Alene Tribe, Columbia River Inter-Tribal Fish Commission, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation, Cowlitz Indian Tribe, Nez Perce Tribe, Nisqually Indian Tribe, Upper Columbia United Tribes, and the Yakama Nation. All nine of the Native American Tribes, Tribal Nations, and tribal organizations expressed serious concern about foreseeable adverse impacts to treaty-protected resources and rights; most of these tribes and tribal organizations also openly expressed opposition to the proposal (Cowlitz County, DOE, and Corps 2016; Scoping Comments <<http://www.millenniumbulkeiswa.gov/comment-archive.html>>).

“The Cowlitz Indian Tribe believes the [proposal] would likely lead to significant impacts to culturally relevant resources ... The Cowlitz Indian Tribe supports resolutions of the Affiliated Tribes of [Northwest] Indians (ATNI resolution # 13-47 and # 12-53) which opposes the transport and export of fossil fuels in the Pacific Northwest ... We have taken an official policy stance opposing the [proposal] ... The proposed project is likely to harm our current efforts [restoring] culturally significant species and [will] place burdens on future restoration efforts ... The Cowlitz Indian Tribe believes that no amount of monetary or other mitigation measures will be able to offset or eliminate the [adverse] environmental impacts” (Cowlitz Indian Tribe 2013).

Tribal Resources and Reserved Treaty Rights – The SEPA co-leads have acknowledged unavoidable and significant adverse impacts to cultural and tribal resources, including exclusion from and/or reduced access to the treaty-protected usual and accustomed places (e.g., fishing and hunting areas) of several treaty tribes. The proposed action would impact treaty-protected resources; fisheries, fish and wildlife, and the habitats and water quality upon which fish and wildlife depend. The proposed action would impact tribal fisheries, limit or curtail access to usual and accustomed areas, and infringe upon the treaty-reserved rights of tribes. Content included in the Draft EIS suggests that the Millennium Longview Coal Terminal project would have unavoidable and significant adverse impacts to tribal resources and reserved treaty rights (Cowlitz County and DOE 2016; Summary, pp. S-16, S-17, S-41). In addition, to date, the Applicant and SEPA co-leads have failed to identify mitigation measures that would meaningfully and adequately avoid these significant impacts. For these reasons, the Service recommends against approval of the Millennium Longview Coal Terminal project.

Social and Community Resources – The Draft EIS assesses and describes foreseeable impacts to social and community resources (Cowlitz County and DOE 2016; Summary, pp. S-12 through S-14, S-32, S-41):

- “Trains [would] affect accessibility to community resources and public services ... because of increasing wait times at grade crossings.”

- “Trains ... would increase emergency vehicle delay at rail crossings.”
- “The proposed action would have a disproportionately high and adverse effect on minority and low-income populations.”

The rail transport corridor includes more than 200 at-grade crossings, including numerous under-protected crossings (USFWS 2016b). Increased rail traffic and resulting disruptions to community resources and access represent significant adverse impacts. To date, the Applicant and SEPA co-leads have failed to identify mitigation measures that would meaningfully and adequately avoid these significant impacts.

Water Quality – The Draft EIS assesses and describes foreseeable impacts to water quality (Cowlitz County and DOE 2016; Summary, pp. S-22 through S-24):

- “Rail operations could release contaminants to water resources ... resulting in the potential for water quality impairment ... Fuel or hazardous materials spills from a vessel incident or a collision or derailment of a train would have [significant, adverse] impacts on water quality ... The magnitude of the potential impact would depend on the location of the spill, the volume of the spill, and weather and tidal conditions.”
- “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 ... particles would be transported ... over a sufficiently broad area that a measurable increase in concentrations ... would be unlikely.”
- “Implementation of the proposed mitigation (Table S-2) ... [including measures to] monitor and reduce coal dust emissions in the project area could reduce impacts on water quality.”

The rail transport corridor includes significant known and unknown geologic hazards (e.g., areas with elevated landslide susceptibility). The rail transport corridor includes more than 200 linear miles of heavily trafficked rail located within 1 mile of the middle and lower Columbia River, and crosses or lies in close proximity to more than 500 unique waterbodies, 50 perennial streams and rivers, and more than 100 distinct fish-bearing reaches, river segments, and shoreline types (USFWS 2016b). Spills that occur at these locations are likely to result in significant adverse impacts to the Service’s trust resources.

The marine vessel transport corridor extends along more than 104 linear miles of the lower Columbia River. Along the lower Columbia River federal navigation channel, much of the land (more than 27 percent) and shoreline is specifically managed for habitat and biological diversity objectives, and more than 10 federal, state, and private wildlife or natural areas could be affected (including the Service’s Julia Butler Hansen and Lewis and Clark National Wildlife Refuges)(USFWS 2016b). According to information included in the Draft EIS, the Millennium Longview Coal Terminal project would cause or result in a 25 to 55 percent increase in deep-draft vessel transits along the lower Columbia River federal navigation channel, with corresponding increased risk of vessel incidents, potential spills, and impacts or damages.

Coal dust includes visible fractions (coal dust or smoke) and invisible fractions. Both contain persistent, toxic pollutants that pose a risk to both human and ecosystem health (e.g., heavy metals, including mercury; polycyclic aromatic hydrocarbons). Smaller coal dust particles, including those present in the invisible fraction, have a comparatively higher surface area, are more likely to travel significant distances before deposition, and are more susceptible to physical and chemical degradation and leaching.

The Service believes that the Millennium Longview Coal Terminal project will cause or result in significant coal dust deposition along the rail transport corridor. We do not agree that the risk of accumulation in soils, sediments, and water is negligible or insignificant. The Service expects that the proposed action will measurably increase toxic pollutant concentrations in soils, sediments, and water, and will very likely result in exposures, potential toxic effects, and impacts to the Service's trust resources.

The Applicant and SEPA co-leads have failed to identify mitigation measures that would adequately avoid these significant impacts. The Applicant and SEPA co-leads have stated, "Coal dust [will] become airborne from rail cars ... [but] the rail cars [will] not be covered" (Cowlitz County and DOE 2016; Coal Dust Fact Sheet). The Applicant and SEPA co-leads have offered no explanation as to why covered rail cars were not considered and adopted as a reasonable measure to avoid and minimize significant adverse impacts to human and ecosystem health. We believe that the proposed mitigation measures, coal pile shaping and topper agents, represent half-measures and do not adequately address these significant impacts.

Rail Safety – The Draft EIS assesses and describes foreseeable impacts to rail safety (Cowlitz County and DOE 2016; Summary, pp. S-30 through S-32, S-42):

- "The proposed action would increase the potential for train accidents ... by approximately 22 percent in Cowlitz County and Washington State."
- "Because the frequency of train traffic on BNSF routes would increase ... the probability of an increase in emergency response time ... would also increase [at all crossings statewide] ... crossings would be blocked more frequently."
- "The proposed action [would] result in a significant adverse environmental impact on rail safety in Cowlitz County and Washington State."

The rail transport corridor includes more than 200 at-grade crossing, including numerous under-protected crossings (USFWS 2016b). Increased rail traffic, resulting disruptions to community resources and access, and increased risk of derailments or other train accidents (e.g., collisions at crossings) represent significant adverse impacts. To date, the Applicant and SEPA co-leads have failed to identify mitigation measures that would meaningfully and adequately avoid these significant impacts.

The Millennium Longview Coal Terminal project would generate significant additional rail traffic. Risk of derailments or other train accidents, and resulting impacts and damages, would be greater at hundreds of known and unknown sites with conditions that already contribute to existing elevated safety risk. Geographic Response Plans have not been established for large

areas of the rail transport corridor, and a survey of first responders in Washington finds that most fire/emergency departments and agencies report inadequate training, materials, and other resources (USFWS 2016b).

On June 3, 2016, a 96-car Union Pacific train carrying Bakken crude oil partially derailed in the town of Mosier, Oregon, in the Columbia River Gorge. Crude was released to the environment, the ensuing fire closed Interstate-84 and a local school, and more than a quarter of the town's population was evacuated (Oregonian 2016a). More than 10,000 gallons of crude reached manholes, was conveyed to the wastewater treatment plant, and ultimately reached Rock Creek and the Columbia River. The town's wastewater treatment plant remained closed several days later and municipal authorities have continued to warn that residents should boil the water they obtain from the public supply (Oregonian 2016a).

The train derailment in Mosier, Oregon, is a tangible example of the significant risks created by new proposals that would put increasing volumes of crude and coal on trains in Washington State and the Columbia River Gorge. These risks have been deemed unacceptable by the vast majority of the affected communities and public interest groups. Yakama Nation tribal members and representatives of the Columbia River Inter-Tribal Fish Commission have described the heightened vulnerability of tribal members and treaty-protected resources and rights (Oregonian 2016b). The cumulative impacts of these new coal- and crude-by-rail proposals put irreplaceable resources at risk of damage, including damage that may never be fully recovered or corrected. For these reasons, the Service recommends against approval of the Millennium Longview Coal Terminal project.

Vessel Transportation – The Draft EIS assesses and describes foreseeable impacts to vessel transportation (Cowlitz County and DOE 2016; Summary, pp. S-32 through S-35, S-42):

- “An increase in vessel traffic [would] increase the risk of vessel-related emergencies, such as fire or vessel allusion.”
- “Increased vessel traffic [would] increase the risk of vessel incidents such as allisions, collisions, groundings, and fire ... [Our] analysis estimated that the proposed action [would] increase the frequency of collisions, groundings, and fires by approximately 1.5 incidents per year.”
- “If an incident occurred during vessel transportation ... the impacts could be significant, depending on the nature and location of the incident, the weather conditions at the time, and whether any fuel [or cargo] 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.”

The Service agrees that some incident scenarios, resulting impacts, and damages are likely to occur over the functional life of the proposed facility (e.g., approximately 30 years). The Service also agrees that large or very large incidents are less likely to occur, but would result in severe impacts and damages to fish, wildlife, and tribal trust resources.

Air Quality (Including Coal Dust) – The Draft EIS assesses and describes foreseeable impacts to air quality (Cowlitz County and DOE 2016; Summary, pp. S-35 through S-37):

- “Statewide, the largest increase in locomotive emissions for any one pollutant would be for carbon monoxide at 38 percent, followed by nitrogen oxides with a 15 percent increase ... For commercial marine vessels, the relative increase would be a maximum increase of 12 percent for [volatile organic] emissions and just under 11 percent for carbon monoxide emissions.”
- “During rail transit, wind and air moving over the train [will] blow coal dust off the rail cars and disperse it into the air ... [and to] the ground ... Coal dust would also be generated and dispersed ... during coal stockpiling and handling activities in the project area.”
- “There are no federal or state guidelines or standards that identify acceptable levels of [coal] dust deposition ... A reference standard [is] commonly cited, [based] on ... a New Zealand Ministry of Environment study ... This Draft EIS uses [the reference standard] to identify a threshold for nuisance-level dust deposition ... coal dust that affects the aesthetics, look, or cleanliness of surfaces ... not the health of humans [or] the environment.”
- “[Our] study found the proposed action would result in coal dust [deposition] ... along the rail lines ... While the average and maximum deposition ... was estimated to [exceed] the nuisance thresholds at [some locations], no state or federal standards apply ... This would be an unavoidable but not significant [(or insignificant)] impact.”

Locomotive emissions, including diesel particulate matter, and coal dust could have serious human health implications for affected communities along the rail transport corridor. The Applicant and SEPA co-leads have failed to identify mitigation measures that would adequately avoid these significant adverse impacts. The Applicant and SEPA co-leads have offered no explanation as to why covered rail cars have not been considered and adopted as a reasonable measure to avoid and minimize significant adverse impacts to human and ecosystem health.

Greenhouse Gas Emissions and Climate Change – The Draft EIS assesses and describes foreseeable impacts to greenhouse gas emissions and climate change (Cowlitz County and DOE 2016; Summary, pp. S-37 through S-39, S-43):

- “Greenhouse gas emissions were estimated ... in Cowlitz County, as well as ... outside Cowlitz County, including rail and vessel transportation.”
- “Greenhouse gas emissions ... attributable to the proposed action would be driven primarily by coal combustion in Asia and the United States ... Under the preferred 2015 Energy Policy scenario, the change in emissions, or the net annual emissions, from the proposed action in 2028 would be 3.2 million metric tons of CO₂ (equivalent) ... This is equivalent to adding about 672,100 passenger cars on the road each year.”

- “The total net emissions for the preferred 2015 Energy Policy scenario from 2018 to 2038 would be 37.6 million metric tons of CO₂ (equivalent) ... The total net emissions are the sum of emissions ... compared to a no-action scenario in which the proposed action would not be not constructed ... This would exceed various thresholds that are proposed in federal and state regulations and guidance.”
- “The climate change impacts resulting from this increase ... would persist for a long period of time, beyond the analysis period, and would be considered permanent ... The climate change impacts, while global in nature, would affect Washington State ... Based on these considerations, emissions attributable to ... the proposed action ... are considered adverse and significant.”

Greenhouse gas emissions contribute to observed trends toward increasing global average sea temperatures, ocean acidification, and other disruptions of the global climate system. These trends are a threat to ecosystem function, including aquatic food webs. These trends are a threat to important Tribal, commercial, and recreational fisheries, and to all of the Service’s fish and wildlife trust resources.

Content included in the Draft EIS indicates that life-cycle greenhouse gas emissions resulting directly and indirectly from the proposed action will exceed 37.6 million metric tons of CO₂. The Applicant and SEPA co-leads have failed to identify mitigation measures that would meaningfully avoid or reduce these significant adverse impacts. For these reasons, the Service recommends against approval of the Millennium Longview Coal Terminal project.

The Service concludes that the Millennium Longview Coal Terminal project is likely to have unavoidable and significant adverse impacts to air, water, and sediment quality. The proposed action would emit, directly, indirectly, and cumulatively, large quantities of greenhouse gases and toxic air pollutants. These emissions could threaten the quality and function of fish and wildlife habitats along the middle and lower Columbia River, and beyond.

Fish and Wildlife – The Draft EIS assesses and describes foreseeable impacts to fish and wildlife (Cowlitz County and DOE 2016; Summary, pp. S-25 through S-28):

- “Increases in vessel traffic [would] increase the risk of fish stranding from vessel wakes.”
- “Routine operations ... could result in spills or leaks of hazardous materials from vehicles, trains, or equipment ... Contaminants could affect terrestrial habitat and water quality, thus, degrading aquatic habitat in the Columbia River.”

The SEPA co-leads have acknowledged potential direct impacts to fish, wildlife, and their habitats, including those that would result from increased marine vessel traffic (e.g., wake stranding of salmonids). The Applicant and SEPA co-leads have failed to identify mitigation measures that would adequately avoid significant impacts resulting from wake stranding along the marine vessel transport corridor. The Draft EIS also acknowledges that vessels pose a risk of introducing nonnative and invasive species, and that ballast water exchange practices and requirements do not fully mitigate those risks.

Locomotive emissions and coal dust are likely to accumulate in soils, sediments, and water, and may thereby result in measurable indirect impacts and damage to fish and wildlife trust resources. Spills and resulting adverse impacts along the rail and marine vessel transport corridors could result in "take" under the ESA [Sections 3(19) and 9(a)(1)] and/or adversely affect designated critical habitat, including critical habitat which has been designated by the Service for bull trout and by the National Marine Fisheries Service for numerous salmon and steelhead stocks (or Evolutionarily Significant Units).

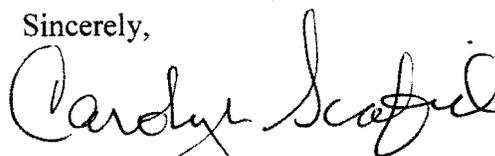
The Service is aware that communities and a concerned public throughout the study area, including treaty tribes and tribal organizations, have voiced concerns regarding transport safety, security, readiness, response, and inherent vulnerability along the transportation corridors to and from the proposed Millennium Longview Coal Terminal. Cost-benefit analyses prepared in support of coal- and crude-by-rail proposals should acknowledge or consider significant impacts, damages, and costs. Otherwise, these omissions are a significant concern to the Service. The Service believes that failure to account for externalities, including social and environmental impacts and damages, results in findings that are skewed and incomplete.

There is a strong emerging State and regional consensus that coal- and crude-by-rail proposals pose unacceptable risks, and that associated costs and damages may exceed the economic benefits that accrue to local communities and the State. The SEPA co-leads should broaden their consideration of social and environmental factors where possible, and should monetize and provide to the public a thorough and comprehensive accounting of all the foreseeable impacts, costs, and damages that are likely to result from the Millennium Longview Coal Terminal project.

In summary, the Service believes that the Millennium Longview Coal Terminal project would have unavoidable and significant adverse impacts, and would damage fish, wildlife, and tribal trust resources. Therefore, the Service does not support the current proposal. We believe that the SEPA co-leads should recommend against approval of the facility/project.

Thank you for the opportunity to review and offer comments for the Draft EIS. If these comments are unclear, if the SEPA co-leads have related questions, or would like to further discuss this proposal and/or the SEPA process, please contact Ryan McReynolds (Consultation and Conservation Planning Division; Email: ryan_mcreynolds@fws.gov).

Sincerely,



for Eric V. Rickerson, State Supervisor
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Sources Cited

- Cowlitz County and the Washington State Department of Ecology (Cowlitz County and DOE). 2016. State Environmental Policy Act Draft Environmental Impact Statement for the Millennium Bulk Terminals – Longview Project (April 2016). Available On-Line at <<http://www.millenniumbulkeiswa.gov>>; Accessed 6/1/2016.
- Cowlitz County and the Washington State Department of Ecology (Cowlitz County and DOE). 2014. State Environmental Policy Act Draft Environmental Impact Statement, Scoping Summary Report. Appendix J *In* Cowlitz County and the Washington State Department of Ecology (Cowlitz County and DOE). 2016. State Environmental Policy Act Draft Environmental Impact Statement for the Millennium Bulk Terminals – Longview Project (April 2016). Available On-Line at <http://www.millenniumbulkeiswa.gov/assets/mbtl_sepa_deis_appendix-j_scopingsummaryreport.pdf>; Accessed 6/1/2016.
- Cowlitz Indian Tribe. 2013. Letter to Colonel Bruce A. Estok, Seattle District Commander, U.S. Army Corps of Engineers – Scoping Comments for Millennium Bulk Terminals Longview, LLC (MBTL) Project NEPA/SEPA Environmental Impact Statement. November 18, 2013. 3pp.
- The Oregonian / Oregon Live. 2016a. Days after oil train derailment, normal seems far away in scenic Mosier. [By Carli Brosseau.] Available On-Line at <http://www.oregonlive.com/pacific-northwest-news/index.ssf/2016/06/days_after_oil_train_derailmen.html>; Accessed 6/8/2016.
- The Oregonian / Oregon Live. 2016b. Tribes face some of greatest risks from oil train wrecks in Columbia River Gorge, leaders say. [By Molly Harbarger.] Available On-Line at <http://www.oregonlive.com/politics/index.ssf/2016/06/tribes_face_some_of_greatest_r.html>; Accessed 6/8/2016.
- U.S. Fish and Wildlife Service. 2016a (January 20, 2016). Native American Policy – Working with Native American Tribes. 20pp.
- U.S. Fish and Wildlife Service. 2016b. Letter to the State of Washington Energy Facility Site Evaluation Council, Subject: Public Notice and Draft Environmental Impact Statement for the Tesoro Savage Vancouver Energy Distribution Terminal Facility. Washington Fish and Wildlife Office, Lacey, Washington. January 22, 2016. 7pp.
- U.S. Department of the Interior and U.S. Department of Commerce. 1997 (June 5, 1997). Secretarial Order 3206. 14pp.