

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

2602 Cascade Way  
Longview, WA 98632  
September 17, 2013

EIS Scoping Managers;

I have been involved in salmon recovery efforts for a number of years, first as a County Commissioner here in Cowlitz County, and subsequently as the Clark County ESA Program Manager (now retired). Salmon are major contributors to both aquatic and terrestrial ecosystems of the Northwest. Nearly every salmon in the Columbia River system passes through here, and over the years, billions of public dollars have been allocated to salmon research and recovery. So, I am concerned about the potential impacts of dissolved, suspended, or sedimentary coal dust on salmon and their habitat.

In light of the dearth of applicable scientific data, the EIS should:

- Review any existing studies;
- Sample existing coal dust presence in riparian and aquatic areas along the Cowlitz County transport area, the Millennium site, and downstream Columbia to establish a baseline;
- Propose further studies of coal dust effects specific to salmon lifecycles prior to project approval; or erring on the side of caution,
- Propose a prohibition of discharge of any coal dust in transit, storage, and loading;
- Describe an accountability system that repeats the sampling protocol on a periodic basis and requires cleanup, along with more stringent dust controls in the event of evidence of degradation.

In addition, the EIS should be used to help determine if a consultation with NOAA Fisheries is required under the ESA.

Thank you for your consideration,

  
Joel Rupley