

October 25, 2013

U.S. Army Corps of Engineers
Washington Department of Ecology
Cowlitz County



Re: Scope of Review for Millennium Bulk Terminals—Longview EIS

Thank you for the opportunity to comment. I submit this letter on behalf of the Pacific Northwest Waterways Association (PNWA). PNWA is a regional trade association that advocates for federal policy and funding for navigation infrastructure projects in the Northwest. We represent multiple industries in the public and private sectors in Oregon, Washington, Idaho, and California. Members include public ports, terminals, navigation, transportation, international trade, tourism, agriculture, forest products, energy and local government interests. Since its founding in 1934, PNWA has supported the development of infrastructure for navigation, electric power and irrigated agriculture on the Columbia and Snake River System. In 1971, PNWA expanded, adding Puget Sound and 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, tourism, energy and environmental policy to enhance economic vitality in the Pacific Northwest.

PNWA would like to provide comment on the scope and review process for the Millennium Bulk Terminals project in Longview, WA, as well as the Columbia Snake River System's readiness for growth and ability to handle the additional tonnage that Millennium would bring to the river.

The Columbia Snake River System is a 470 mile transportation link for the states of Idaho, Montana, Oregon, Washington and beyond. The river system has great local, regional and national benefits. It is the number one U.S. export gateway for wheat and barley, and number one West Coast export gateway for wood and mineral bulk products. It is the third largest grain export gateway in the world. In 2010, over 42 million tons of cargo valued at more than \$20 billion moved on the Lower Columbia River, directly supporting over 40,000 local jobs.

In 2010, the region celebrated the completion of the Columbia River Channel Improvement Project. The State of Washington joined with the U.S. Army Corps of Engineers and the State of Oregon to invest over \$183 million to deepen the Columbia River navigation channel to 43 feet. The purpose of this project was to make the river system more marketable, enable more tonnage to move, and to bring new business and jobs to our region. Channel deepening, as well as significant recent lock repairs, have solidified the Columbia Snake River System's position as one of the nation's leading international trade gateways.

The goal of these infrastructure investments was to ensure that our navigation system is poised to accept an increase in vessel traffic and tonnage, and to handle more cargo than ever before. Ports and businesses along the Columbia Snake River System, including Millennium Bulk Terminals, would like to move more cargo on the river system. The promised job growth, tax revenue, and economic development for local communities which were promised from channel deepening can only be realized if ports and terminals are able to bring more cargo to the system.

Regardless of the commodity moved, PNWA supports project level review. Project level review must provide for a reasonable and unbiased scope for a terminal facility without regard to the commodity or product to be shipped. PNWA supports a thorough environmental review by state and federal agencies

consistent with law. This process also provides opportunities for comment by elected officials and the public.

The permit requested by Millennium Bulk Terminals to construct and operate an export facility is similar to what could be requested for other terminals that would handle other commodities such as grain and other bulk products. Increasing or expanding the scope of the review process for this project would be inappropriate and would set a precedent of similar requirements for other terminal and transportation projects that is unacceptable. Such a scope of review would undermine past and present policy and investment commitments of the State of Washington.

In evaluating permits, state and federal agencies play the critical role of gatekeeper for the compliance with law and consistent and equitable application of law and policy. Decisions to expand the scope of the review, as was done with the Gateway Pacific Terminal, amount to a significant public policy shift. Specifically, the development and expansion of key elements of transportation infrastructure, such as a terminal facility, is not a reasonably close causal connection to the development or use of a product or commodity. The development or expansion of a federal channel, a state or interstate highway, or a terminal facility such as that proposed by Millennium does not cause or create, directly or indirectly, the impacts related to the extraction of any natural resource, the harvesting of any agricultural product, the manufacturing of any part or product, or the use of such resources, or products.

The requests for an expanded scope, which would certainly delay projects, are also at odds with the national and regional goals to increase exports and support economic development. In March 2010 as part of the Administration's National Export Initiative, President Obama announced an ambitious goal of doubling exports within five years. Washington State's Governor Inslee has also noted that his "top priority is to create and sustain a thriving economic climate that spurs job growth in every industry sector and every corner of Washington state." Millennium Bulk Terminals' project is an example of economic development and job creation for communities in the Lower Columbia region, a corner of Washington State that continues to slowly recover from the recession.

Thank you for the opportunity to provide comment. We respect and support the agencies' thorough review process, and encourage Washington Department of Ecology, the Corps and Cowlitz County to maintain a project-level scope and process consistent with law.

Sincerely,



Kristin Meira
Executive Director
Pacific Northwest Waterways Association