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[comments@millenniumbulkeiswa.gov](mailto:comments@millenniumbulkeiswa.gov)

re: MBTL Coal Export Terminal EIS c/o ICF International

Subject: **Docket number 2013-19738**: Comment on scope of EIS for Millennium Bulk Terminals Longview LLC Coal Export Terminal

To: **U.S. Army Corps of Engineers  
WA Department of Ecology  
Cowlitz County Commission**

**Gentlemen & Ladies:**

As a Chemical Engineer (WSU), Senior Project Manager, former Army Engineer Corps construction manager and prior Vice President of Design and Construction with Billions of dollars of significant projects including rail, water, trans-shipments and materials handling, environmental protection systems, water/land transport, you can rely on my comments as professional, true and accurate.

See my earlier submittals to U.S. Army Corps and WA Dept of Ecology (PDF attached) regarding Gateway Pacific. Basically, and further, there's **no reason to conduct the EIS since this flawed, ridiculous project will "never fly" anyway. Army Corps of Engineers is a Federal agency. Federal Courts will intervene to put a stop to Longview's flawed siting (cease & desist order).**

I will provide specific comments, additionally and separately, regarding details of major failures of the EIS process to adequately cover scope for Longview's foolhardy project. Too many jurisdictions are involved and no one agency is properly or professionally coordinating (or capable of coordinating the impacts reviews) for the public's protection. Army Corps of Engineers isn't qualified nor do they have sufficient authority. Army Corps lacks the depth of skills and experience to deliver a workable solution. This Longview Project will be "mission impossible" for even a fully skilled and knowledgeable independent design firm. You have my word on it.

A simple example of a similar cross-state issue for WA state was attempts to ship nuclear fuel wastes to Hanford using rail or truck shipments. At the proper time, the Governor and Legislature intervened to stop it altogether. This one will be similarly blocked. Why waste time, money and EIS scoping effort to try such a poorly planned, environmentally disastrous project **which will not happen??** In addition,

Native American lands (e.g. ATNI and others) and waters are severely impacted. Read ATNI's resolution regarding intent and reasoning for blocking all such projects. Legal issues are insurmountable. Do you get the point yet?? Forget this Longview Project. It's a loser and will never proceed.

You have my e-mail comments sent through the Power Past Coal initiative over many months, including more today. You already have my engineering and policy comments for the Columbia River trans-loading site in Oregon near Hood River. This concept is a disaster in the making and must be discontinued. No further work should be done to further this project. You also have my comments provided for the fatally flawed Bellingham, WA (Gateway) terminal site which is totally unacceptable to all the communities along the proposed coal shipping routes, water/rail and ship loading terminals.

These same exact technical and regulatory problems and fatal flaws exist for the MBTL Coal Export Terminal, as well. There is no significant difference under any conceivable circumstances. Stop all further consideration of such unsafe, technically faulty/flawed and disastrous projects. If Canada wishes to pursue these foolhardy initiatives, let them have the coal. Washington and Oregon should be spared the ecological impacts and certain safety risks to our people and environment.

I strongly oppose the construction of ANY coal export terminal at Longview, WA that would transport coal on trains and ships throughout the Northwest. This proposal would negatively affect my State and surrounding communities by increasing congestion and noise with more coal train traffic, polluting our land, air and local waterways, harming existing businesses, and delaying emergency responders. It will damage aquatic ecosystems and fishing areas on the Columbia River, harm human health, increase tanker traffic and the potential for shipping accidents and spills, expand strip-mining in Wyoming and Montana, and escalate climate change.

Technologies to properly contain coal dust and prevent pollution of ground and water are insufficient, unproven and incapable of reducing or containing serious long-term impacts to humans, animals, ecosystems and aquatic life. Operational controls to manage and safeguard the safety of people and environment are insufficient or not yet developed for such a massive transfer of coal over decades with multiple trans-shipment exchanges along heavily populated, sensitive ecosystems on land, rail and water routes. This makes no economic or regulatory sense to further consider such a tragic approach. How can it even be professionally assessed? The answer is that it CANNOT BE sufficiently evaluated or regulated.

**The project should be cancelled. If not immediately,** then as an Engineer, manager and scientist, I urge you to fully and completely attempt to assess and consider these impacts and fatal flaws in the analyses within the scope of the Environmental Impact Statement. Thank you. **See PDF enclosures for specifics.**  
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