

Coal Terminal – Longview PT. 2

Evaluation of the risks of increased shipping traffic through the Columbia River bar, along the Columbia River, and through the Salish Sea associated with the development of all of the proposed port facilities should be part of the draft EIS for the proposed Millennium Bulk Terminal. The bunker fuel capacity of Very Large Bulk Carriers is 500,000 gallons or more (1). Most bulk carrier vessels are single hulled. Historically, their mechanical failure and accident rates are higher than other vessels. (2), (3). Because their vertical surfaces act like a sail these ships are subject to both wind and currents, making them difficult to maneuver at low speeds and out-of-control without power or tug assistance.

(1) Encyclopedia of Environmental Science and Engineering, Fifth Volume, Marine Spillage – Sources and Hazards.

(2) Wikipedia, Bulk Carriers.

(3) Assessment of Oil Spill Risk to Potential Increased Vessel Traffic at Cherry Point, Technical Appendix, Washington University VTRA Study

The proposed facilities that would greatly increase fossil fuel shipping traffic transiting the Columbia River bar and along the Columbia River include:

Coal Export Facilities:

Millennium Bulk Terminal -850 Panamax-class bulkers.

Port Westward Coyote Island Terminal -156 Panamax-class bulkers.

Ambre's Pacific Transloading Barge Dock, Port Westward -624 coal barge tows (each with one tug and four lashed barges).

Crude Oil Export Facilities:

Vancouver Energy Distribution Terminal, Tesoro-Savage -386 tankers/1546 barges

Global Partners (old Columbia Pacific bio-refinery), Clatskanie -31 tankers/123 barges

Paramount Terminal, Portland -details unknown

The estimates total 1423 additional bulkers and tankers, 624 coal barge tows (a tug with four lashed barges), and 1669 crude oil barge tows. These assumptions are based on using the largest bulker and tanker classes possible at maximum cargo efficiency. If smaller vessels are used, the number of vessels increases. Since the total commercial vessel calls at Columbia River Terminals in 2012 was 1340, the proposed cumulative increase in vessel traffic would almost quadruple the 2012 traffic. This does not include the proposed Paramount Terminal at Portland.

The scope of the EIS for the proposed Millennium Bulk Terminal should include vessel traffic and risk analysis studies for the increased vessel traffic from all the proposed facilities. A vessel traffic risk assessment should consider not only the increased vessel numbers, but also that the additional vessels would require newly hired and newly trained pilots for navigation. The additional vessels would have largely foreign crews. As the world bulker fleet ages, mechanical and structural failures will result in an increased rate of collisions, allisions and groundings. See: <http://www.shipwrecklog.com/log/> for up-to-date shipping accident reports.

The additional bulkers and tankers would necessarily transit the Columbia River bar at the mouth of the Columbia River when arriving and when leaving the river. This treacherous passage is called "the Graveyard of the Pacific" because so many ships have foundered there. What is the risk of a significant fossil fuel spill if the number of ship transits across the treacherous Columbia River bar more than doubles? Bulk cargo vessels carry hundreds of thousands of gallons of fuel just to power their engines. Oil tankers carry much, much more fossil fuel.

The following is from "Running the Bar" in the February, 2009 Smithsonian Magazine: 'Each of the 16 bar pilots has the authority to close the bar when conditions are too dangerous. Still, Jordan says, "When we shut down the bar for two days, trains are backed up all the way into the Midwest. And just like a traffic jam on the freeway, once you clear the wreck, it takes a long time for it to smooth out again." "There's a lot of pressure on us to keep working all the time," says Gary Lewin, a bar pilot for 26 years.'

<http://www.smithsonianmag.com/science-nature/Running-the-Bar.html>

The development of the proposed Millennium Bulk Terminal, Port Westward Coyote Island Terminal, and Ambre's Pacific Transloading Barge Dock, Port Westward would add significantly more ship traffic crossing the Columbia River bar. The proposed Millennium Bulk Terminal project would add around 1700 Panamax size ships transits across the Columbia River bar. The proposed Port Westward Coyote Island Terminal would add around 312 Panamax size ships transits across the Columbia River bar. Will this intensity of shipping traffic be possible considering that just shutting down "the bar" for two days of bad weather in 2009 resulted in trains backed all the way into the Midwest? The pressure to transit the bar in bad weather will increase and the risk of accidents will increase if the Millennium Bulk Terminal project is permitted. During severe storms, bulk cargo ships and tankers will stack up in the dangerous waters off the Oregon Coast waiting for a weather window to open so that they can transit the Columbia River bar.

What would be the consequences for the environment in the event of a major fuel or oil spill? What would be the consequences to Chinook salmon, especially if the migrating salmon smelts were caught in a fuel or oil spill? What would be the cumulative impacts to Chinook salmon from more frequent releases of smaller amounts of fuel from the increased shipping traffic? What would be the consequences to the federally listed Endangered Southern Resident Killer Whales if their winter food supply of Upper Columbia River and Snake River Chinook salmon significantly declines? Has anyone considered that we already have problems on our coast and in our inland seas from discharged water-ballast, carrying non-native creatures, which are ever more frequently wiping out our local species, and making other costly mischief? This problem would multiply with the planned increase in shipping traffic.

All the tremendous impacts described above *cannot* be fully mitigated, so please consider the *"no build option"* for the proposed Millennium Bulk Terminal.

Sincerely,

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