



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

OFFICE OF THE  
REGIONAL ADMINISTRATOR

**NOV 18 2013**

Ms. Danette L. Guy  
U.S. Army Corps of Engineers, Seattle District  
Care of: MBTL EIS  
710 Second Avenue, Suite 550  
Seattle, Washington 98104

Dear Ms. Guy:

The U.S. Environmental Protection Agency has reviewed the U.S. Army Corps of Engineers' September 6, 2013 Notice of Amendment to the Notice of Intent to Prepare an Environmental Impact Statement for the proposed Millennium Bulk Terminals-Longview Shipping Facility Project. The EPA's comments are provided pursuant to our authorities under the National Environmental Policy Act, Section 309 of the Clean Air Act, and the Clean Water Act.

The purpose of an EIS is both to provide decision makers with necessary information regarding potential environmental impacts before a decision is made and to inform the public debate. The MBTL project is one of several terminal projects proposed in the Pacific Northwest to provide for the export of coal being extracted from the Powder River Basin. These proposed projects are of great interest to the local communities, and we appreciate your efforts to hold several public meetings during this scoping period.

EISs for projects of this magnitude regularly evaluate a broad range of potential environmental impacts. The EIS for this project should examine the direct environmental impacts from constructing and operating the new terminal at the project site, including 32-35 acres of wetlands, the 48-acre area that would be dredged, the dredged material disposal site(s) for approximately 500,000 cubic yards of substrate, any other area in or adjacent to the Columbia River that would be affected by the proposed project, and any off-site area that might be used for compensatory mitigation.

In addition to looking at the direct impacts in the immediate vicinity of the proposed terminal, CEQ regulations (Section 1502.16) instruct agencies to consider other effects that are reasonably foreseeable. Thus, in addition to considering the impacts occurring at and near the site of the terminal, we recommend that the EIS evaluate potential impacts along the full route associated with transportation of coal to the terminal. That evaluation would appropriately include the potential increases in fugitive coal dust and diesel emissions that would accompany the additional rail traffic to the terminal, and the potential related human health impacts to communities along the proposed routes. These types of impacts are exactly the kind of reasonably foreseeable potential impacts that NEPA was designed to address.

Other reasonably foreseeable impacts that we recommend be evaluated in the EIS include the potential for effects in the United States from combustion of the exported coal. The anticipated use of the proposed shipping facility is to export coal. Because pollutants, including mercury, particulate matter and ozone precursors, can travel long distances in the air, we would recommend using existing models

to review the reasonably foreseeable potential for air and water quality impacts in the United States. The life cycle greenhouse gas emissions associated with the project are also appropriate to consider in this analysis. The methodologies for conducting that analysis are available and well developed; the Corps could draw on good examples of life cycle greenhouse gas emissions done in NEPA analyses by other federal agencies.

The EPA also recommends that environmental impact from increases in regional rail traffic and combustion of coal in receiving markets be examined in the context of other proposed export facilities in the Pacific Northwest region, so that reasonably foreseeable cumulative environmental impacts from additional facilities can be understood before a decision is made, as NEPA contemplates. The cumulative effects analysis would appropriately include increases in regional train traffic and related air quality effects on human health, and the potential for effects to human health and the environment from changes in the long-range transportation of air pollution, as well as greenhouse gas emissions.

We also note that there are several Tribes that have expressed interest in the proposed project, and we believe it will be important that the Corps engage in meaningful government-to-government consultations. We are aware that Tribes have raised questions over, for example, potential impacts to fisheries, salmon habitat and cultural resources.

We continue to appreciate the coordination you have carried out to date, and we look forward to working with you as a Cooperating Agency in developing the EIS. The EPA has expertise and data that may be useful to you in the preparing your analysis of potential impacts, and we are prepared to provide technical assistance, including more detailed information on recommended approaches for modeling and predicting impacts and suggestions for potential mitigation measures. If you have any questions, please contact me or Christine Reichgott at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov).

Sincerely,



Dennis J. McLerran *for*  
Regional Administrator