



November 18, 2013

Comments Submitted via EIS on-line form submittal and email:

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RE: Scope of Review for EIS-Millennium Bulk Terminals Longview proposal

MBTL Environmental Reviewing Agencies:

The Port of Longview (Port) appreciates the opportunity to comment on the scope of impacts to be considered in the Environmental Impact Statement (EIS) for the Millennium Bulk Terminal Longview proposal. The Port of Longview is a public port operating upriver of the Millennium location as well as a land owner of undeveloped, industrial property adjacent to and down river of the proposed terminal site.

The Port would like to voice comment toward a few areas that relate to the proposed Millennium terminal, but more broadly towards the environmental evaluation process as a whole.

The Port provides a very real and quantifiable economic development service to the local Port district as well as the State of Washington. As such, new and/or redeveloped industry aids in economic growth within our local economy, which provides stability, sustainability, and a hopeful future. In the case of this EIS scope, the Port would like to voice our request that our river ecosystem, transportation corridors (river, road and rail), economy, and quality of life here in our district are thoroughly evaluated to ensure that any proposed impacts by the terminal are identified and mitigated for as would be required for any new or redevelopment project.

Specifically, the Port's connection to world trade is through the existing transportation corridors. All avenues of transportation (river, road and rail) allow the Port to be an economic driver for this community and the state. Therefore, it is essential that the scoping for this EIS takes into account the impacts that the proposed increase in rail traffic will have to existing rail dependent users, local and interstate traffic congestion, and local and interstate emergency response timeframes. Further, while there is adequate river capacity for increased ship traffic, there is a lack of ship anchorage availability. This fall there were ships layberthed at the Port, as well as anchored off the mouth of the Columbia River waiting to get to their destination due to the lack of anchorage in the river system. With the additional ship traffic proposed by this terminal, an impact study should be conducted to determine if that increase warrants additional anchorages.



As a public port, we are also interested in proposals and permitting throughout the State of Washington and the impact on our trade and economy. We understand that many projects are required to navigate through some of the strictest of state regulations, as well as federal regulation interpretations, within the United States. This of course, in turn, provides our State with an environmental quality of life envious to others. However, it is not clear how incorporating an impact analysis on freight infrastructure that includes review across state lines, the production of the product, its transportation to markets, and its ultimate use is fair or encourages reasonable economic development and equitable trade through the most trade dependent state in the nation.

This new evaluation formula sets precedence that the State may not be able retract from. For example, it would be difficult or impossible for Boeing to build a plant for military aircraft in Washington State if the NEPA/SEPA required them to account for the likely use of all the military aircraft during their service life. However, such a facility may bring a huge boost to the economy and highly paid jobs. How would the State proceed in such a situation?

The Port has participated in many lengthy state and federal environmental processes, and has had projects delayed due to concerns that eventually were evaluated and mitigated for. While the process can be disconcerting due to the evaluation timeframe and most often extensive mitigation requirements, we do hold the belief that the environmental impact scoping and analysis process, if conducted according to its reasonable geographical and legal parameters, is a process that works.

Best Regards,

A handwritten signature in blue ink that reads 'Norman G. Kahlil'.

for Geir-Eilif Kahlagen
Chief Executive Officer

Cc via email: Eric Johnson, Executive Director
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