

November 14, 2013

Proposed Millennium Bulk Terminals-Longview EIS  
c/o ICF International  
710 Second Avenue, Suite 550  
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Dear Danette Guy, Dr. Elaine Placido, and Diane Butorac,  
Please include my comment letter below in the comments on the  
scope of the EIS for the proposed Millennium Bulk Terminals  
Longview LLC Coal Export Terminal: Docket number 2013-19738.

The one fiber optic cable to the San Juan Islands has been severed  
for some time and communication by telephone and internet are  
unreliable.

Thank-you,  
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## Increased Shipping Traffic From The Proposed Millennium Bulk Terminal at Longview and Other Proposed Fossil Fuel Export Facilities on the Columbia River Requires Analysis of Cumulative Impacts

As the domestic use of coal continues to fall, the pressure to export taxpayer-subsidized coal to Asia from Pacific Northwest ports increases. Uncompetitive and sub-market rate leases for the mineral rights on BLM lands in the Powder River Basin were originally designed to promote domestic "energy security" for electricity generation in the United States. Times have changed. The negative aspects of burning coal begin with the destruction of land and water resources at the mine sites to the release of mercury and other toxic metals into the global atmosphere during the combustion of coal. Rising above these impacts in magnitude and extent are the effects of Climate Change that include sea level rise, ocean acidification, and storms of increased intensity such as the record-breaking and tragic Typhoon that swept across the Philippines on November 8, 2013. The pressure to export coal from the Pacific Northwest is driven by the desire for corporate profits in the mining, rail, port, and shipping industries. A limited number of jobs would be provided by the expansion of these highly mechanized industries. Additional jobs would be better supplied by growing our "green" economy. This includes jobs that increase the energy efficiency of homes, businesses, and transportation, and jobs that expand solar and wind powered electricity generation. The comments below describe the risks associated with the increased shipping traffic that would result from expansion of the export of coal and other fossil fuels from Columbia River ports.

The increased shipping traffic from the proposed Millennium Bulk Terminal and other proposed projects will increase the risk of shipping accidents and fuel spills along the Columbia River and during transits of the Columbia bar. Although the annual number of oil tanker spills fell about three-fold world-wide between 1992 and 2011, the number of fuel spills for allisions, collisions, and groundings of tankers and bulk cargo carriers in restricted and inland waters did not decrease during this period. These data indicate that improvements in the shipping industry and the efforts of the International Maritime Organization and national governments have not decreased the number of accidents in inland and restricted waters. Since the Columbia River is an inland waterway, the risk of a significant fuel spill here is at least three fold higher than the world-wide average. In contrast to the fall in tanker oil spills (likely due to requirements for double-hulls and other structural improvements in tanker design), world-wide bunker fuel spills did not decrease between 1992 and 2011. (See Figures 9 & 13 in: Trends

in Oil Spills from Tankers and ITOPF Non-tanker Attended Incidents Susannah Musk -Technical Support Coordinator -International Tanker Owner Pollution Federation Ltd, ITOPF London, UK). Bunker fuel is the fuel used by ship engines. It is heavier and more polluting than other fuels. Tankers and bulk carrier ships routinely use bunker fuel oil because it is cheaper. A spill in San Francisco Bay of only around 53,000 gallons of bunker fuel oiled about 200 miles of coastline, shut down fisheries and closed beaches to recreation.

The bulk carrier vessels that would ship coal from the proposed Millennium Bulk Terminal will carry hundreds of thousands of gallons of onboard fuel to power their engines. The increased bunker fuel demand would be met by refineries near Anacortes and north of Bellingham Bay. This would increase the tanker shipping transiting the restricted and hazardous waters of the San Juan Archipelago and the Salish Sea. Increased shipping traffic increases the risk of collision, allision, or grounding and increases the risk of environmentally destructive fuel spills in these ecologically rich marine waters.

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 to 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 smolts 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?

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

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## Who Will Pay The Costs Of A Disastrous Fossil Fuel Spill Associated With The Increased Shipping Traffic Generated By Millennium Bulk Terminals- Longview?

Bulk cargo ships carrying coal are not covered by the oil spill conventions that apply to oil tankers. The bulk cargo carriers visiting the Millennium Bulk Terminals- Longview may not carry adequate insurance to cover the costs of a disastrous propulsion fuel spill along the Columbia River or near the Columbia River bar. The coal export companies may not use their own bulk cargo vessels to transport the coal overseas. The “flag-of-convenience” system allows the ship owners to be legally anonymous and difficult to prosecute in civil and criminal actions.

An oil spill off the coast of Spain was from a double-registered vessel, the Prestige. It was a Liberian-owned vessel with a Greek captain and Filipino crew. This ship was also registered in the Bahamas. Shipping companies double register vessels to lower their operating costs and take advantage of less restrictive laws within developing countries. Also, liability in case of a disaster falls on the ship’s crew and not on the shipping company. This business practice is called “Flag of Convenience.” “Open Registry” describes organizations that will register ships owned by foreign entities. In 2009, 13 flag states had substandard regulations.

Please include answers to the following questions in the scope of the Millennium Bulk Terminals- Longview EIS:

How many flag-of-convenience registered ships currently visit facilities along the Columbia River?

How many additional flag-of-convenience registered ships will visit facilities along the Columbia River if the proposed Millennium Bulk Terminals- Longview is permitted?

How many additional flag-of-convenience registered ships will visit facilities along the Columbia River if the all of the proposed fossil fuel export facilities are permitted?

What are the limits on liability associated with registering vessels as independent entities not associated with the major coal export companies?

Who will be liable for the costs of a disastrous fossil fuel spill associated with the increased shipping traffic?

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## Infrastructure Upgrades to the "432 Mess" Must Be Included in the Scope of the Millennium Bulk Terminal EIS

I strongly oppose the construction of a coal export terminal at Longview, WA, which would transport coal on trains and ships throughout the Northwest.

As a taxpayer in Washington State, I am concerned about the increased public revenue expenditures that will be required for infrastructure improvements associated with the proposed Millennium Bulk Terminal at Longview, Washington. I live in San Juan County, WA. I have been closely following my county's 6-year transportation plans for several years, and I know that the funds for major projects come from state grants.

The transportation infrastructure surrounding the Port of Longview is locally known as the "432 Mess." According to a 2008 study for the Cowlitz-Wahkiakum Council of Governments, (<http://www.cwcog.org/transportation.htm>) traffic on State Route 432, traffic crossing the Lewis and Clark Bridge, traffic from Longview city streets, and rail traffic all converge to create a 2,800-vehicles-per-hour traffic jam.

Former Port of Longview marketing director Gary Lindstrom has said, "There's no way you can put coal trains through Longview without fixing SR 432." If the proposed Millennium Bulk Terminal is built, sixteen new coal trains will travel through the "432 Mess" each day. The cost of upgrades to alleviate the congestion is estimated to be \$100 to 200 million.

Please study the costs of new Lewis and Clark Bridge ramps that would overpass a relocated rail line along with the costs of renovated city streets and a new railroad bridge. Who would pay for these infrastructure improvements? What would be the costs to taxpayers? What would be the interruptions to traffic flow while the improvements are being built? How long would the improvements take to build? What would be the costs to local businesses and residents for time lost to construction delays?

These costs and impacts must be included within the scope of the Millennium Bulk Terminal at Longview EIS because they are immediately adjacent to the proposed terminal.

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