



Janet Alderton  
PO Box 352  
Deer Harbor, WA 98243

Millennium Bulk Terminals-Longview EIS  
c/o ICF International  
710 Second Avenue, Suite 550  
Seattle, WA 98104

November 14, 2013

Proposed Millennium Bulk Terminals-Longview EIS  
c/o ICF International  
710 Second Avenue, Suite 550  
Seattle, WA 98104

Danette L. Guy  
Biologist/Project Manager  
U.S. Army Corps of Engineers, Seattle District  
Regulatory Branch  
Southwest Field Office  
2108 Grand Boulevard  
Vancouver, WA 98661

Dr. Elaine Placido  
Director  
Cowlitz County Department of Building and Planning  
207 4<sup>th</sup> Avenue North  
Kelso, WA 98626

Diane Butorac  
Regional Planner  
Department of Ecology, Southwest Regional Office  
P.O. Box 47775  
Olympia, WA 98504-7775

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,  
Janet Alderton  
491 Harborview Lane  
PO Box 352

## 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?

Thank-you,  
Janet Alderton  
Deer Harbor, WA