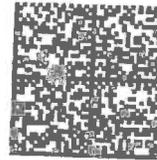




207 4th Avenue N. ~ Kelso, WA 98626-4195



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

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November 14, 2013

Cowlitz County Building & Planning
c/o Elaine Placido
207 4th Avenue North
Kelso, WA 98626

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

U.S. Army Corps of Engineers
c/o Danette Guy
2108 Grand Boulevard
Vancouver, WA 98661

Washington State Department of Ecology
c/o Diane Butorac
PO Box 47775
Olympia, WA 98504

Via U.S. Mail & email to comments@millenniumbulkeiswa.gov

RE: "Scoping Comments: SR 432 Rail Realignment and Highway Improvement Project and the Millennium Coal Export Project Environmental Impact Statement"

Cowlitz County, U.S. Army Corps of Engineers and the Washington State Department of Ecology:

The Cowlitz-Wahkiakum Council of Governments (CWCOG) serves a diverse membership in a two-county region within the southwest portion of Washington State. We are a multi-purpose association of governments established to deliver a diverse array of federal, state and local programs, including the bi-state Metropolitan Planning Organization (MPO), comprised of the urbanized area of Longview and Kelso, Washington and crossing the Columbia River to include the city of Rainier, Oregon.

CWCOG is the current project owner of the SR 432 Rail Realignment and Highway Improvements Project. This \$4.55 million project is funded by \$2.55 million in federal Surface Transportation Program (STP) funds under SAFE-T-LU and \$2 million from the state transportation budget. The project covers the length of the industrial corridor adjacent to the Columbia River in Longview, Washington, beginning at Interstate 5 and ending at Barlow Point. The current project entails identifying rail and highway concepts that will make the corridor safer and more efficient for all users. The core purpose is to improve safety, congestion, mobility, access, and freight capacity of the transportation system. More information on the project can be found at www.SR432Corridor.org.

Comments have been submitted during the Millennium Bulk Terminal (MBT) Environmental Impact Statement (EIS) Scoping Process requesting that the SR 432 Rail Realignment and Highway Improvements Project be subsumed under the purview of the MBT EIS. This request was submitted by a coalition of environmental

Counties of Cowlitz and Wahkiakum ~ Cities of Longview, Kelso, Woodland, Kalama, Castle Rock and Rainier, Oregon ~ Town of Cathlamet ~ Ports of Longview, Kalama, Woodland and Wahkiakum #1 ~ Cowlitz PUD ~ School Districts of Longview, Kalama, Kelso, Woodland and Castle Rock ~ Beacon Hill Water & Sewer District ~ Cowlitz 2 Fire & Rescue ~ Cowlitz County Fire District #5 ~ Lower Columbia College ~ Lower Columbia Community Action Program ~ Cowlitz Economic Development Council ~ Longview Housing Authority ~ Kelso/Longview Chamber of Commerce ~ Wahkiakum Chamber of Commerce

organizations including Columbia Riverkeeper, Sierra Club, Washington Environmental Council, Landowners & Citizens for a Safe Community, Climate Solutions, and Western Organization of Resource Councils.

Such an approach would be inappropriate and would not serve the public interest for a number of reasons, as outlined below:

1. The entire route of SR 432 is designated as an Intermodal Connector within the National Highway System, which identifies roadways important to the national economy, defense, and mobility. SR 432 is also designated as a Highway of Statewide Significance by WSDOT. Within the Washington State Freight Mobility Plan, SR 432 is considered as a "T-1" truck freight route (moving more than 10 million tons per year), an "R-1" rail route (greater than 5 million tons per year) and the Columbia River at this point is a "W-1" economic waterway (greater than 25 million tons per year). These are the highest classifications for these systems, as defined by the volume of freight goods movement. This transportation network includes a multi-modal hub of highway, rail and marine transportation services that serve an international trade market. This sets it apart in scale, scope and purpose from the development of a single site along the corridor.
2. CWCOG has been studying the SR 432 corridor for the past two decades, beginning with the *State Route 432 Corridor Planning Study* completed in June 1989. The corridor has undergone a series of changes and improvements based upon these studies over the years. Please note that the SR 432 corridor history timeline has been attached for your reference. The MBT proposal came into public view in 2010, when the first permit application was filed for a site-specific bulk coal terminal. The SR 432 study entails identifying concepts that would address safety, congestion and mobility problems along the corridor.
3. The SR 432 project will undergo full environmental review and compliance with NEPA and SEPA, because it is a federally funded project. Federal Highway Administration (FHWA) has environmental decision authority over this project. There has been no attempt whatsoever to avoid a rigorous examination of the issues. There has been no determination that the project will receive a Determination of Categorical Exclusion (DCE). The record of environmental decision is made at the discretion of FHWA.
4. State Route (SR) 432 rail and road infrastructure improvements are not intended to support or facilitate a single business or property along the SR 432 corridor. In fact, the MBT project could move forward using existing rail track, should it successfully meet conditions of permitting.

The SR 432 project entails the study of concepts to support freight mobility, safety, and congestion of the transportation system that serves the region. The Millennium Bulk Terminal, should it receive permits and be constructed, would be only one of many users of the regional transportation system. If MBT is not successful, the SR 432 project would still help to ensure safety, mobility and capacity of the rail/highway/marine transportation system for whatever use is established at that site as well as the many other sites along the corridor.

When completed, the SR 432 Rail Realignment and Highway Improvement Project will serve our region, our state and our nation. This will be accomplished with future infrastructure improvements that enhance mobility by reducing congestion and increasing safety for the rail and highway system users along the SR 432 corridor. This project will provide the users of the Columbia River, such as the Port of Longview and other waterfront businesses that import and export bulk commodities on a global basis, an enhanced rail and highway network to off-load and load their exports and imports.

The CWCOG therefore respectfully requests that the SR 432 Rail Realignment and Highway Improvements Project not be considered for inclusion under the scope of the MBT Environmental Impact Statement (EIS).

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If there are any questions regarding the SR 432 project or if you would like to discuss the project, please do not hesitate to contact Melissa Taylor, the SR 432 project manager at 360-577-3041 or mtaylor@cw cog.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Patterson".

Scott Patterson
Executive Director

Attachments:

- (1) Cowlitz-Wahkiakum Council of Governments July 8, 2013 correspondence with Columbia Riverkeeper, et al
- (2) SR 432 corridor history timeline



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July 8, 2013

Brett VandenHeuvel, Executive Director, Columbia Riverkeeper
Jessica Yarnall Loarie, Associate Attorney, Sierra Club
Gayle Kiser, Landowners & Citizens for a Safe Community
Kelly Mitchell, Climate and Energy Campaigner, Greenpeace
Lauren Goldberg, Staff Attorney, Columbia Riverkeeper

Dear Mr. VandenHeuvel and others:

Thank you for contacting us regarding your concerns with the SR 432 Rail Realignment and Highway Improvement Project. As the Executive Director for the Cowlitz-Wahkiakum Council of Governments (CWCOG), the lead agency for this initial phase of the project, I am happy to provide this response.

As you may know, the SR 432 Rail Realignment and Highway Improvement Project is in a preliminary stage. We are currently collecting data on user needs and conducting analysis of rail and traffic data in order to define project needs (e.g., defining the problem(s) we are trying to solve). That information will be used to identify a range of project concepts that could address those needs, particularly as they relate to the rail and highway system as a whole. As these concepts are developed in the months ahead, there will certainly be opportunities for public outreach and involvement.

As the SR 432 project moves into the "Identification of Project Alternatives/Alternatives Analysis" phase during 2014, there will be more public dialog about proposed options and choices. Once the preferred option is selected, environmental discipline reports will be developed, and these will guide decision makers regarding the appropriate level of environmental clearance. For this phase of the SR 432 project, there are two separate steps that must be met: 1) SEPA (the state's environmental policy act) with a local agency other than the CWCOG (i.e. City of Longview, Port of Longview or Cowlitz County) serving as project lead, and 2) NEPA (the federal government's environmental policy act) with the Federal Highway Administration serving as the NEPA lead agency with final approval authority. It should be noted that the SEPA lead agency will be determined after the alternatives phase has been completed and the preferred option is identified.

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Castle Rock ~ Beacon Hill Water & Sewer District ~ Cowlitz 2 Fire & Rescue ~ Cowlitz County Fire District #5 ~ Lower Columbia College ~
Lower Columbia Community Action Program ~ Cowlitz Economic Development Council ~ Longview Housing Authority ~ Kelso Longview
Chamber of Commerce ~ Wahkiakum Chamber of Commerce

Brett VandenHeuvel, et al

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In closing, we would be happy to meet with you to discuss the SR 432 project in more detail if you are interested in doing so at this time, or at some future point, as the project develops. Please contact Katie Wells, Administrative Assistant at the CWCOG office (360-577-3041), to schedule a meeting.

Sincerely,



Scott Patterson
Executive Director

SP/kw

cc: **Bob Gregory, City Manager, City of Longview**
Sharon Love, Environmental Program Manager, Federal Highway Administration
Elaine Placido, Director of Building & Planning, Cowlitz County
Mike Karnofski, Cowlitz County Commissioner
Brian D. Wood, Environmental Manager, Weyerhaeuser
Geir-Eilif Kalhagen, CEO, Port of Longview
Don Wagner, Regional Administrator, Washington State Department of Transportation,
Southwest Region

SR 432 Corridor History Timeline

YEAR	ACTIVITY
1988	The Lower Columbia ports request U.S. Army Corps of Engineers study deepening the Columbia River shipping channel
1989	SR 432 Route Jurisdiction Study (SR 411 to SR 4) completed designating Industrial Way as SR 432
1990	Columbia River Channel Deepening Reconnaissance Report completed
1995	City of Longview acquires the Mint Farm for industrial park development
1996	Port of Longview begins development of Industrial Rail Corridor
1998	Grand opening of the Mint Farm Industrial Park
1999	Port of Longview begins construction of Berth 8
2000	Port of Longview dedicates Berth 8
2001	SR 432 Route Development Plan (I-5 Exit 36 to SR 4) completed
2002	Port of Longview begins construction of Industrial Rail Corridor and completes construction of Fibre Way overpass
2003	SR 432/Talley Way Interchange improvement study begins
2003	Columbia River Channel Deepening Final Environmental Impact Statement and feasibility study completed
2004	Columbia River Channel Deepening Record of Decision issued
2005	Port of Longview Industrial Rail Corridor opened for business
2006	Columbia River Channel Deepening dredging begins
2008	SR 432 Realignment Feasibility Study (Tennant Way to 3rd Avenue and Industrial Way from 3rd Avenue to 38th Avenue) completed
2009	SR 432/Talley Way Interchange improvements begin construction
2009	Washington State receives American Recovery and Reinvestment Act high speed rail stimulus funding for projects throughout the state
2010	Columbia River Channel Deepening dredging completed
2010	Port of Longview purchased Barlow Point property for future industrial development
2011	SR 432/Talley Way Interchange (I-5 Exit 36) improvements constructed
2012	BNSF Railway begins capacity improvements
2013	SR 432 Rail Realignment and Highway Improvements Project study gets underway