



File Code: 1900

Date: November 18, 2013

Ms. Danette L. Guy  
US Army Corps of Engineers, Seattle District  
c/o MBTL EIS Co-Lead Agencies  
710 Second Avenue, Suite 550  
Seattle, WA 98104

Dear Ms. Guy,

The USDA Forest Service appreciates the opportunity to provide comments on the proposed Millennium Bulk Terminals coal export facility in Longview, Cowlitz County, Washington, during the scoping phase of the environmental impact statement (EIS) process.

Our understanding of the project is as follows: Millennium Bulk Terminals – Longview LLC (MBTL) is proposing to construct a coal export terminal adjacent to the Columbia River in Cowlitz County, Washington. The primary purpose of this terminal would be to receive, stockpile, blend, and load coal onto ships for export. The complete proposed facility would require construction of eight rail lines and one operating line; two new docks, two shiploaders; coal stockpile pads; and associated facilities, conveyors, and equipment on 190 acres of the 536-acre site. The project EIS includes two Stages. Under Stage 1, up to 25 million metric tons of coal would be handled. Under Stage 2, the maximum volume would increase to 44 million metric tons.

MBTL proposes to bring coal to the site by rail from sources in the western United States. Based on information provided for the scoping period for the Gateway Pacific Terminal project proposal in Whatcom County, the MBTL project would be expected to increase regional rail traffic by about 16 trains per day (8 round trips). The trains would travel through Spokane, WA, then continue to the MBTL site using three possible routes: (1) through the Columbia River Gorge National Scenic Area (CRGNSA); (2) over Stevens Pass, and/or (3) over Stampede Pass. Trains would also return to the coal fields along one of these routes. Given the proximity of the proposed Longview site to the Columbia River, it is reasonable to expect that much of the increased rail traffic would use the existing rail lines running through the CRGNSA.

The project is currently in the scoping phase of the EIS process. During this time agencies and the public have an opportunity to provide input about the following:

- A reasonable range of alternatives including alternative sites and project designs based on the project purpose;
- Potentially affected natural, cultural, or community resources and the extent of study and analysis needed to understand each potential impact;
- Significant probable unavoidable adverse impacts; and
- Measures to avoid, minimize, and mitigate (offset) effects of the proposal.



The Forest Service is concerned about impacts associated with the trains as they travel through public lands managed by the Forest Service, including lands within the Columbia River Gorge National Scenic Area. Based on the 2010 Washington State Rail System Map, trains would pass through one or more of the following lands managed by the Forest Service: the Okanogan-Wenatchee National Forest, the Mt Baker-Snoqualmie national Forest, and the Columbia River Gorge National Scenic Area. The Forest Service is concerned about fire starts, air and water quality impacts, invasive species, and noise impacts associated with the additional rail activity.

The increase in rail traffic would increase the probability of new fire starts and wildfires. Over the past ten years the CRGNSA has responded to 61 fires that have started on or near the railroad tracks. The fires can result from sparks emitted by rail grinding and welding activities, railcar brakes, and engine turbochargers. During dry and windy conditions these sparks can be blown for a considerable distance, igniting fires both within and well beyond the immediate vicinity of the tracks. The main fire season is typically June through mid-October. It is our understanding that, within the Columbia River Gorge, the great majority of welding and grinding occurs outside of fire season. However, were the additional rail traffic associated with the MBTL proposal to occur, it would probably increase grinding and welding work during throughout the year, including during fire season. The Forest Service would like these track maintenance activities to be conducted outside of fire season as a way to minimize the likelihood of new fire starts.

When initial fire starts occur on lands managed by the Forest Service, the agency dedicates its resources toward initial attack to suppress these fires. This not only adds a burden to the financial and human resources of the agency, it also increases risks to human life, property, and other natural and cultural resources. In addition, wildfires emit air pollutants, including smoke and greenhouse gases, which have known potentially harmful direct or indirect effects.

The Forest Service is also concerned about air and water quality. Fugitive emissions of coal dust originate from rail cars as they pass through National Forest System and other lands. These emissions may result in reduced visibility and increased concentrations of suspended particulate matter. The Columbia River Gorge Air Study and Strategy<sup>1</sup> identifies continued improvement as the goal for visibility in the Gorge. Please describe how the increased rail traffic associated with operation of the proposed MBTL facility would be consistent with this goal. Deposition of coal dust may also pose an unacceptable risk to affected terrestrial and aquatic ecosystems depending on the volume and constituents of the coal dust and the locations where it is deposited. The Forest Service would like the project analysis to consider the impacts of coal dust associated with rail transport, and possible mitigations, including the use of covered rail cars to reduce dust emissions as the trains pass through the CRGNSA.

Invasive species are an ongoing issue in the CRGNSA, and the potential for new introductions and increased spread of existing infestations as a result of increased rail traffic and related rail maintenance activities is a concern. Measures to control invasive plant species should be designed in consultation with the Forest Service to ensure that invasive species infestations are not inadvertently promoted as a result of rail traffic, track maintenance and associated removal of vegetation. Please identify potential mitigation measures that may be used to minimize impacts from invasive species that might occur in the CRGNSA as a result of this proposal.

The CRGNSA is known for providing high quality recreational experience. The increased frequency and magnitude of noise disturbance associated with the additional rail traffic is of concern, because it may negatively impact the recreation experience in the CRGNSA. Please consider effects to recreation in your analysis, and identify potential mitigation measures that may be used to minimize noise impacts.

We appreciate your consideration of these comments. Please direct any questions to Robin Shoal, Planning and Natural Resource Staff for the Columbia River Gorge National Scenic Area, at 541-308-1716, or at [rshoal@fs.fed.us](mailto:rshoal@fs.fed.us).

Sincerely,

*/s/ Lynn Burditt*  
LYNN BURDITT  
Area Manager

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<sup>1</sup> Oregon Department of Environmental Quality and Southwest Clean Air Agency. September 15, 2011. Columbia River Gorge Air Study and Strategy. [http://www.deq.state.or.us/aaq/gorgeair/docs/11aq035\\_gorgeAirStudy.pdf](http://www.deq.state.or.us/aaq/gorgeair/docs/11aq035_gorgeAirStudy.pdf)