

November 18, 2013

Ms. MBTL Coal Export Terminal
MBTL Coal Export Terminal EIS
C/o ICF International
710 Second Ave., Suite 550
Seattle, WA 98104

In future correspondence please refer to:

Log: 110413-50-CW

Property: Cowlitz County Revised SEPA Determination of Significance & Request for Comments on
Scope of EIS for Millennium Bulk Terminals Longview LLC Coal Export Terminal Revised

Re: Cultural Resources

We are contacting you regarding the EIS scoping for the proposed Millennium Bulk Export Terminal Project, Longview, Cowlitz County, Washington.

We request that archaeological and historic resources be clearly identified and addressed in the proposed Environment Impact Statement. The scope of this project is quite large and there have previously been no thorough surveys of the project area or sufficient cultural resources survey efforts to identify the presence of archaeological and/or cultural resources. The Millennium Bulk Terminal project area has a high probability for containing cultural resources as depicted by the Statewide Predictive Model (see Figure 1). The Coffin Hills Site 45CW3 is approximately 2,700 feet from the proposed bulk terminal (Figure 2). Over 3,000 Native American burials were identified at this site in 1948. Although anecdotally these burials were removed, no information exists that corroborates this story. No precise information exists on the dimensions of the 45CW3 and it is possible that it may extend into the terminal project area. The proposed dredging is troubling from our standpoint based on the proximity of 45CW3 in conjunction with the historically fluctuating water levels.

We understand that the scope of the proposed EIS identifies the study area to include only the actual terminal facility itself and associated areas within the river to be dredged. We disagree with this approach. There are clearly identifiable and reasonable foreseeable effects of the Millennium Bulk Export Terminal Project that indicate a greatly expanded geographic scope which would include rail routes and seaward carriers.

A reasonably foreseeable effect that requires an expanded geographic scope includes effects from the increased rail traffic, and coal cars that are proposed along the rail routes in Washington State. The scope of this project, and the associated train traffic, pose unique issues when developing the necessary cultural resource studies.

The geographic scope must include a consideration of the potential impact of the rail portion of the undertaking upon National Register listed or eligible historic districts, Main Street program communities, and those jurisdictions with local historic preservation programs (i.e. Certified Local Governments).

Local preservation programs may have locally designated historic properties along the routes and the potential socioeconomic impacts to these resources should be part of the analysis. Therefore, the EIS must include all communities bisected or traversed by the rail routes in Washington. Please see the attached Figure that documents the location of Historic Districts, Main Street Program Communities, and Certified Local Governments.

Panamax and Cape-sized dry bulk carriers along the Washington Coast and entering the Columbia River are clearly a reasonable and foreseeable effect of the Project that should create a seaward boundary of the EIS. The increased vessel traffic, associated wakes, waves, and shoreline erosion of these vessels and the increased risk of accidents, oil spills and damage all need to be considered.

Further considerations that should be within the EIS include construction of additional track right of way and spurs, direct and indirect effects of train traffic including vibration to historic structures, noise and traffic upon historic districts, and the impact to archaeological and historic properties due to derailments. Please see Figure that documents the location of archaeological sites and districts along the rail routes from Spokane to Longview.

Other considerations are the potential impacts from the Rail Safety Improvement Act of 2008. This Act mandates the requirement for Positive Train Control Technology (PTC) for high volume freight traffic with toxic hazardous materials. The needed infrastructure along the rail lines is a reasonably foreseeable effect of this project and should be included in the EIS. There will also be substantial coordination with federal agencies who oversee changes and upgrades to the rail lines. Will there be a lead federal agency for this undertaking or will all agencies conduct separate Section 106 consultations for this project?

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

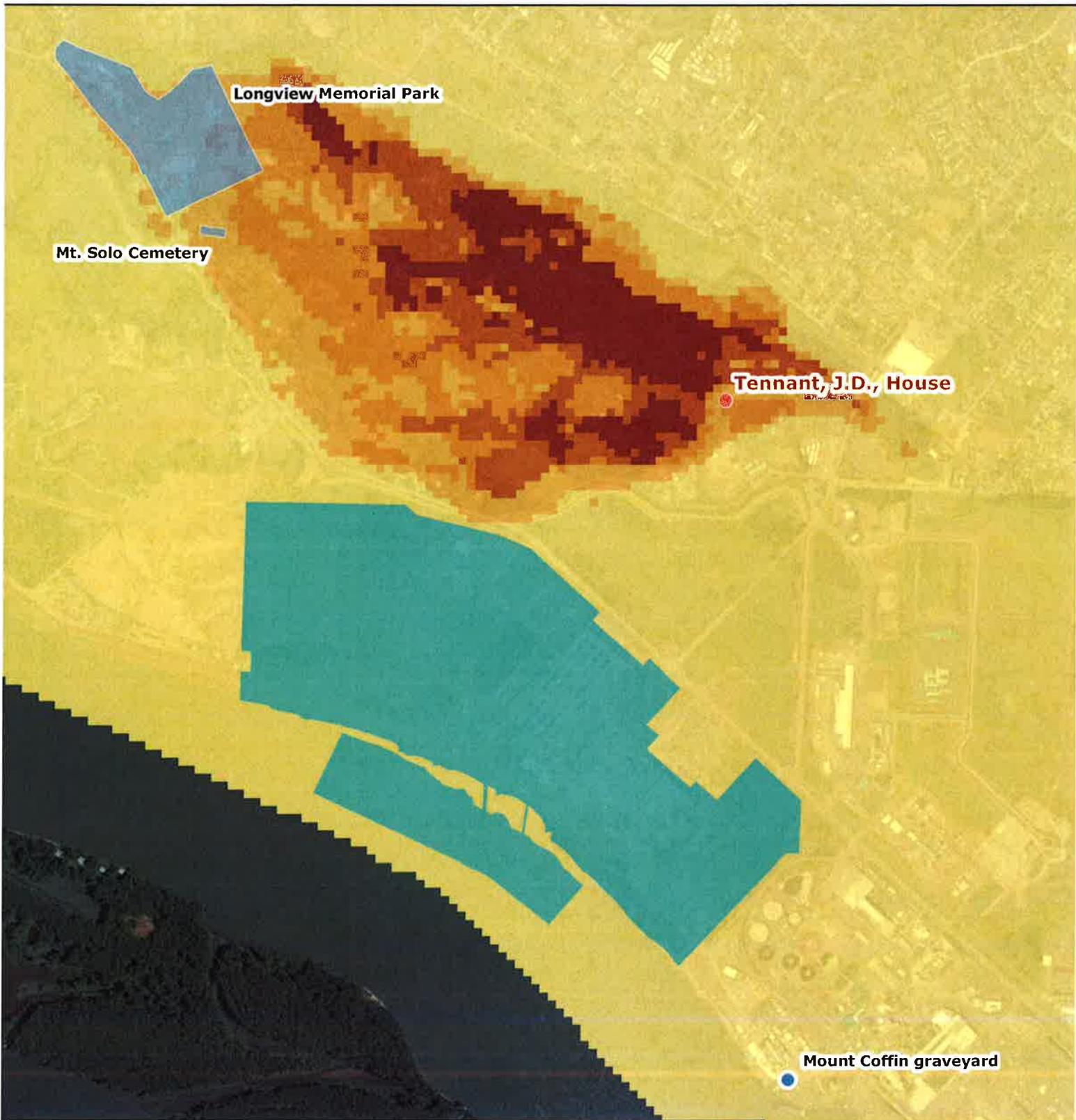
Sincerely,



Gretchen Kaehler
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cc. dAVE Burlingame, Cultural Resources, Cowlitz Tribe
Richard Bellon, General Manager, Chehalis Tribe
Chris Jenkins, Regulatory Branch, Seattle District, Corps of Engineers
Allyson Brooks, SHPO, DAHP
Rob Whitlam, State Archaeologist, DAHP

Figure 1: Archaeological Predictive Model for the Millennium Bulk Terminal Longview Project Area



Legend	
Archaeology Sites	Archaeological Predictive Model
National Register Properties	Survey Contingent Upon Project Parameters: Low Risk
MBTL Coal Export Terminal	Survey Contingent Upon Project Parameters: Moderately Low Risk
	Survey Recommended: Moderate Risk
	Survey Highly Advised: High Risk
	Survey Highly Advised: Very High Risk




Department of Archaeology and Historic Preservation
 PO BOX 48343, Olympia, WA 98504-8343

Figure 2: Cultural Resources within the Vicinity of Millennium Bulk Terminal Longview Project Area



Archaeological Sites, National Register properties, and Local Historic Preservation Programs on Rail Line Corridors

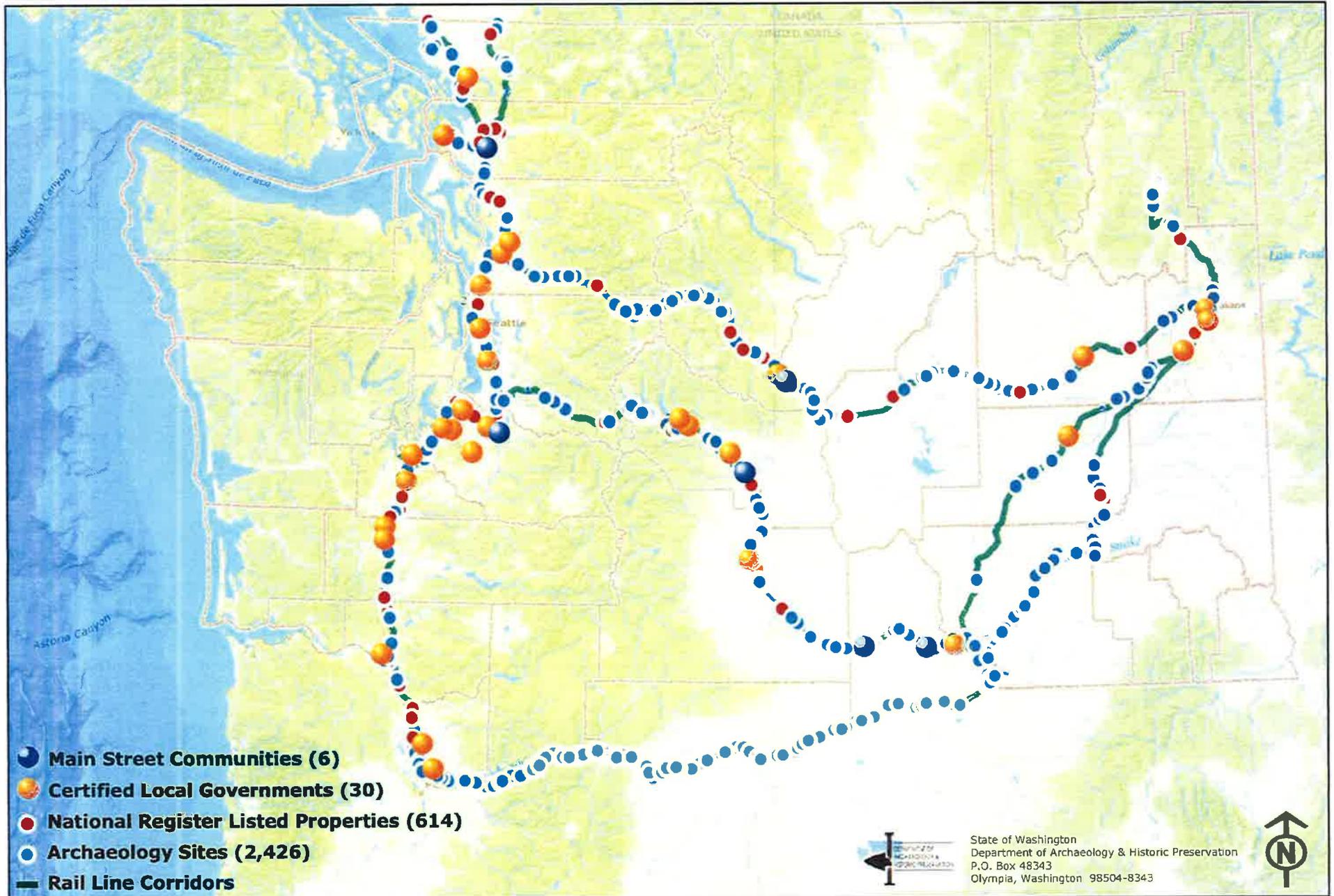


Figure 3