



Cowlitz Indian Tribe

November 18, 2013

Col. Bruce A. Estok
Seattle District Commander
US Army Corps of Engineers
PO Box 3755
Seattle, WA 98124-3755

Subject: Scoping Comments for Millennium Bulk Terminals - Longview, LLC (MBTL) Project
NEPA/SEPA Environmental Impact Statement

Dear Colonel Estok,

I am writing on behalf of the Cowlitz Indian Tribe in regards to the proposed coal export facility by MBTL located in Longview, WA. We appreciate that the US Army Corps of Engineers (USACE), the Washington State Department of Ecology (WADOE), and Cowlitz County (through the Cowlitz County Building and Planning Department (CCBP)) are conducting an Environmental Impact Statement (EIS) on this proposal. We believe that this proposal could lead to significant impacts to the region and beyond.

The public scoping process for this EIS began August 16, 2013 and will close November 18, 2013. Appropriate to the Cowlitz Indian Tribe's federally-recognized status, we ask for continued meaningful government-to-government consultation in regards to this issue. Our comments and project review of the proposed Millennium Bulk Terminals – Longview (MBTL) provided through formal consultation do not constitute public comment, and are not limited to the term of the public comment period. We have scheduled a follow up consultation meeting with you for December 18, 2013 and intend to follow up with the Washington State Department of Ecology and Cowlitz County as the EIS process moves forward. We plan to follow up with additional information and questions throughout the development of the Draft EIS.

The proposed MBTL location is within the aboriginal lands of the Cowlitz Indian Tribe. It is located in an area that carries significant cultural values to us based on thousands of years of continuous occupancy and resource gathering. This proposal would have an impact that would further diminish the culture of the Cowlitz Indian Tribe.

There are several specific points we would like to make regarding the development of the Draft EIS of the MBTL proposal:

The Cowlitz Indian Tribe expects that the action agencies (USACE, WADOE, and CCBP) present a compelling case for the need and purpose associated with this proposal. We would like to understand further as to why there is a need for the agency(s) to take action on the proposal.

We expect that there are a robust number of reasonable alternatives developed that is clearly responsive to the purpose and need for action. We also expect that the alternatives are carefully analyzed and include both potential short term and long-term impacts that the alternatives would likely create. We expect that the alternatives development take into account the appropriate geographic scale of potential impacts of the proposed project that will need to be further analyzed and mitigated.

The Cowlitz Indian Tribe expects that the alternatives developed are analyzed thoroughly in respect to the affected environment and the potential environmental consequences. We expect that the environmental consequences of impacts include direct, indirect, cumulative, and induced impacts in the biological, physical, social, economic, cultural, and aesthetic environments. We expect the most thorough development of scientific analysis be conducted as to eliminate the need to describe having any lack of information or the need to draw assumptions associated to the proposed MBTL. We also expect that there is a clear and logical cost-benefit analysis conducted in connection to all the alternatives and associated environment. We expect that any and all analyses and studies be conducted by qualified individuals of their respective disciplines and to include other appropriate agencies.

The Cowlitz Indian Tribe believes the proposed MBTL would likely lead to significant impacts to culturally relevant resources to the Tribe and its members. the Cowlitz Indian Tribe supports resolutions of the Affiliated Tribes of NW Indians (ATNI resolution # 13-47 and # 12-53) which opposes the transport and export of fossil fuels in the Pacific Northwest and the resolution calling on the US White House Council on Environmental Quality to do a comprehensive impact analysis of all proposed coal transport facilities in the Northwest and beyond. We have also taken an official policy stance of opposing the proposed MBTL. We have and continue to invest heavily in restoring past damages to our environment due to the human developments within the Columbia Basin. The United States Government have invested and continues to invest with tax payer dollars to restore the environmental damages that human developments have caused for over a century within the Columbia Basin. The proposed project is likely to harm our current efforts of restoration of culturally significant species and place burdens on future restoration efforts.

Some of the impacts of a developed MBTL include:

1. Further loss of Columbia River Estuary floodplain lands,
2. Increased vessel traffic in the Columbia bringing concerns toward increased mortality of already endangered or threatened species, etc,
3. Increase in invasive species brought here from international shipping,
4. Decrease in air quality due to transport and movement of millions of tons of Coal within the Columbia Basin,
5. Increase in water withdrawal from the Columbia River Basin of which salmon and other aquatic species rely upon,
6. Decrease in the quality of life and cultural values for the Cowlitz People.

The Cowlitz Indian Tribe believes proposed MBTL will put a strain on existing capacity of established businesses in the region and inhibit future business capacity and growth for more environmentally appropriate business enterprises. The ultimate fate of transported coal shows a likelihood of reducing the air quality and increasing acidification of the waters within and surrounding the Pacific Northwest through overseas coal fired facilities. The Cowlitz Indian Tribe believes that no amount of monetary or other mitigation measures will be able to offset or eliminate the environmental impacts that the proposed MBTL would create.

We expect that the concerns listed are included in the development and analysis of the EIS as we move forward. We will likely continue with follow up concerns and issues as the process moves forward.

A copy of this letter is being provided to WADOE and CCBP. These comments are being provided to these other agencies to be part of the record for the State and Local governments. We expect that our comments will not be listed as part of the public record but handled as an affected tribal government and to be treated with sensitivity as we move forward. Taylor Aalvik, our Natural Resources Department Director, will be our contact in regards to follow up activities associated with this proposal. He can be contacted at: taalvik@cowlitz.org or 360-575-3306.

Sincerely Yours,



William Iyall *P.E.*
Chairman, Cowlitz Indian Tribe

Cc: Maia D. Bellon, Director WA Department of Ecology
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