



# United States Department of the Interior

NATIONAL PARK SERVICE  
Pacific West Region  
909 1<sup>st</sup> Avenue, Suite 500  
Seattle, WA 98104



IN REPLY REFER TO:

1.A.2. (PWRO-NR)

June 9, 2016

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

To Co-Lead Agency Representatives:

National Park Service (NPS) staff has reviewed the April 29, 2016, Draft Environmental Impact Statement (DEIS) for the Millennium Bulk Terminals – Longview (MBTL) coal export project proposed along the Columbia River in Cowlitz County, Washington. The project would involve a maximum annual throughput capacity of up to 44 million metric tons of coal per year. Coal from the Powder River Basin in Montana and Wyoming, and the Uinta Basin in Utah and Colorado, would be transported to the terminal by train. At full terminal operations, approximately eight loaded unit trains each day would carry coal to the terminal, approximately eight empty unit trains each day would leave the terminal, and an average of 70 vessels per month or 840 vessels per year would be loaded with coal for export, which would equate to 1,680 vessel transits in the Columbia River annually.

While MBTL could affect several areas managed or administered by the NPS, our review of the DEIS focused on potential impacts on the three parks that would be most directly influenced by coal transport: Glacier National Park in Montana; Fort Vancouver National Historic Site in Vancouver, Washington; and Lewis and Clark National Historical Park near Astoria, Oregon. Given that our August 21 and November 13, 2013, submittals to the U.S. Army Corps of Engineers during project scoping recommended impact analyses for these areas, we are disappointed they were not addressed in the MBTL DEIS. As discussed in detail in the enclosure, we recommend the Final EIS include a robust analysis of potential project impacts on the three NPS areas.

We are pleased that MBTL is proposing to offset 50 percent of the net operational greenhouse gas (GHG) emissions identified in their 2015 Policy Scenario (page 5.8-22). However, Appendix 2 of Washington's 2010 Climate Change Comprehensive Plan states "maintaining emissions at current levels means we are not on track to meet the state's statutory GHG reduction limit for 2020, and must continue to look for additional opportunities to increase energy efficiency, promote renewable energy, and otherwise reduce our GHG emissions." Therefore,

requiring MBTL to offset all project GHG emissions, including those from both operations and transport, would support the goals of the state's 2010 Plan.

Please contact Tonnie Cumming at 360-816-6201 or [Tonnie\\_Cummings@nps.gov](mailto:Tonnie_Cummings@nps.gov) for further information or if you have any questions regarding our comments.

Sincerely,



Palmer L. Jenkins  
Deputy Regional Director, Pacific West Region

Enclosure: National Park Service (NPS) Detailed Comments on the Millennium Bulk Terminals – Longview (MBTL) April 29, 2016, Draft Environmental Impact Statement (DEIS)

CC:

Tracy Fortmann, Superintendent, Fort Vancouver National Historic Site,  
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**National Park Service (NPS) Detailed Comments on the  
Millennium Bulk Terminals – Longview (MBTL)  
April 29, 2016, Draft Environmental Impact Statement (DEIS)**

Fort Vancouver National Historic Site (NHS)

Fort Vancouver NHS encompasses 209 acres and contains numerous cultural resources associated with American Indians, the Hudson's Bay Company colonial establishment, and the first U.S. Army post in the Pacific Northwest. There are numerous archaeological resources associated with Fort Vancouver NHS including the Fort Vancouver Village ("Kanaka" Village), the pond and Waterfront Complex, and underwater sites within the Columbia River (the Quartermaster East and Benoit sites). The entire area is a listed National Register District. Today, over one million visitors come to the park and its affiliated sites each year to learn more about the history of the Pacific Northwest.

The Burlington Northern Santa Fe (BNSF) railroad runs through Fort Vancouver NHS and a portion of the lines are on an easement that dates back to 1906 when the original Spokane, Portland, and Seattle (SP&S) Line was built across the U.S. Army post. The Final Environmental Impact Statement (FEIS) should evaluate the impacts of increased rail traffic due to MBTL, which could have direct and indirect effects on the historic properties of Fort Vancouver NHS. Increased rail traffic may increase the risk of a derailment that could damage irreplaceable cultural resources, and could pose hazards to visitors enjoying the site. For example, some of the areas immediately adjacent to the railroad contain highly sensitive and significant subsurface archaeological resources associated with the colonial period of the Pacific Northwest. A derailment in these areas could directly damage or destroy these resources. Similarly, we assume the coal dust that would accumulate on and adjacent to the tracks would have to be removed regularly; the FEIS should discuss how coal dust removal could affect subsurface archaeological resources adjacent to the tracks. Finally, we recommend the FEIS evaluate the impact of increased vibration associated with more frequent train passage on archaeological resources of the park.

The FEIS should evaluate the increased frequency of visual and audible impacts from rail traffic on visitor experience at Fort Vancouver NHS. We are concerned that the increased rail traffic due to MBTL could diminish the ability of visitors (including American Indians and Native Hawaiians) to make connections to the historic properties of the district, including in particular, aspects of feeling and setting. Views from inside and adjacent to the Fort, Village, and Waterfront Complex may be disrupted, affecting the ability of the visitor to orient to the historical context of the site. Some of these sites may have a special significance to American Indian tribes.

Glacier National Park (NP)

Glacier NP preserves more than a million acres of forests, alpine meadows, lakes, rugged peaks, and glacial-carved valleys in the Northern Rocky Mountains. Its diverse habitats are home to nearly 70 species of mammals including the grizzly bear, wolverine, gray wolf, and lynx. Over 270 species of birds visit or reside in the park, including such varied species as harlequin ducks, dippers, and golden eagles. The park is named for its prominent glacier-carved terrain and

remnant glaciers descended from the ice ages of 10,000 years past. Bedrock and deposited materials exposed by receding glaciers tell a story of ancient seas, geologic faults and uplifting, and the movement of giant slabs of the earth's ancient crust overlaying younger strata. The result of these combined forces is some of the most spectacular scenery on the planet.

The BNSF railroad runs adjacent to, and at times forms the southern boundary of, Glacier NP. The rail line borders Bear Creek and the Middle Fork Flathead River, a designated wild and scenic river that is world-renowned for whitewater rafting and fishing. The railroad also crosses several park streams and well-established avalanche chutes. We are concerned about potential impacts from coal dust and train derailments on gateway communities, as well as on park water quality and aquatic life--specifically the federally-threatened bull trout (*Salvelinus confluentus*) and the westslope cutthroat trout (*Oncorhynchus clarkii lewisi*), a state species of concern. When available, results of the U.S. Geological Survey study mentioned on page 5.7-5 of the DEIS should be used to assess the impacts of coal dust exposure on aquatic resources at Glacier NP.

The 1977 Clean Air Act amendments have requirements to protect air quality in 156 mandatory Class I national parks and wilderness areas, including Glacier NP. The Clean Air Act also directs the NPS to protect air pollution-sensitive resources such as visibility, streams, lakes, vegetation, soils, and wildlife in Class I areas. The FEIS should assess the impact of coal dust and train emissions associated with MBTL on air quality in Glacier NP.

Visitor and employee safety is of interest at Glacier NP because several high use and developed areas are adjacent to the railroad tracks and more rail traffic increases the likelihood of derailments. In addition, research has shown the current traffic level of about 30 trains per day affects wildlife movement and survival. For example, from 1998-2011, thirty-one out of 290 (11%) confirmed deaths of threatened grizzly bears in the Northern Continental Divide Ecosystem (NCDE) of Montana were due to collisions with trains. Train collisions represent the fourth most common form of human-caused mortality in the NCDE grizzly bear population (US Fish and Wildlife Service, 2013). Increased rail traffic could further restrict wildlife movement and increase mortality in and near the park. The FEIS should assess the impacts on Glacier NP of increased rail traffic associated with MBTL.

#### Lewis and Clark National Historical Park (NHP)

Originally established as Fort Clatsop National Memorial, Congress in 2005 expanded and redesignated the park as Lewis and Clark NHP "in order to preserve for the benefit of the people of the United States the historic, cultural, scenic, and natural resources associated with the arrival of the Lewis and Clark Expedition in the lower Columbia River area, and for the purpose of commemorating the culmination and the winter encampment of the Lewis and Clark Expedition ..." (Public Law 108-387). Today, the park is comprised of seven units totaling approximately 3,400 acres in Pacific County, Washington and Clatsop County, Oregon.

Six of the units of Lewis and Clark NHP are along the shoreline of the lower Columbia River Estuary or nearby along the coast of the Pacific Ocean. As a result, the park could be impacted by the estimated 1,680 vessel transits in the Columbia River per year; this would represent a 38% increase from the projected 4,440 transits of other cargo vessels estimated for the year 2028

(page 5.4-39). This increase in vessel traffic will lead to an increase in total incident frequency and an increase in the risk of oil spills (page 5.4-43). To that end, we suggest the FEIS say "Increased vessel transport could also affect the Lewis and Clark National Historic Trail and **Lewis and Clark National Historical Park ...** " [pages S-16 and 3.4-16]. If oil or cargo spills occur near the units of Lewis and Clark NHP, the park's natural and cultural resources could be affected. The extent of the adverse impact would depend on tides, weather, and the emergency response.

We appreciate that MBTL recognizes the potential for oil spills from vessels underway and incorporated those analyses and impacts into the DEIS. However, the analysis of oil spills in the Columbia River is confined to a narrow timeframe: 2004 - 2014 (page 5.4-44). Because large oil spills have long incident recurrence intervals, we recommend that the timeframe of analysis be extended. For example, the November 24, 2015, DEIS for the Tesoro Savage Vancouver Energy Project included a historical timeframe of 1990 to 2011; as a result, the DEIS reported the expected interval of a spill over 1,000 billion barrels due to a vessel grounding or collisions to be 34 years. Extending the baseline period further to 1984 would allow the analysis to include the grounding of the *Mobil Oil* near Warrior Rock in the Columbia River that spilled 200,000 gallons of heavy oil.

Lewis and Clark NHP could also be affected by coal dust from vessel transport. While there are two mitigation methods outlined for minimizing coal dust near the terminal and from rail cars (pages S-56 and S-57), no similar mitigation is discussed for vessels. We recommend the MBTL FEIS include coal dust mitigation measures for vessel transport.

