



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 26, 2012

Colonel John W. Eisenhower
U.S. Army Engineer District, Portland
333 SW First Avenue, Tenth Floor
Portland, OR 97204-3495

**RE: Environmental Assessment for Coyote Island Terminal, LLC;
US COE Number NWP-2012-56**

Dear Colonel Eisenhower:

I am sending this letter in response to the US Army Corps of Engineers (Corps) announcement in September 2012 that an Environmental Assessment (EA) would be prepared for the proposed Coyote Island Terminal. As noted in my May 7, 2012 letter to you, I believe that only an Environmental Impact Statement (EIS) with a robust cumulative impact assessment will provide sufficient opportunity for analysis and public comment. I urge the Corps to move directly to the EIS process for this proposal located in Oregon near the Washington border along the Columbia River.

I understand that an EA provides studies and information to help evaluate the significance of a proposal. As the Corps considers direct, indirect and cumulative effects in the EA process, I believe you will find that some of these cumulative effects have the potential for significant impact and will trigger the need to prepare an EIS. It's noteworthy that the Corps has received thousands of public comments and numerous city and county resolutions demonstrating substantial environmental controversy for this project. This proposal warrants the more robust assessment an EIS will provide and expanded public outreach and opportunity for comment.

The simultaneous emergence of multiple proposed coal export terminals in Washington and Oregon constitutes a unique situation that has never before occurred in our region. Together, the projects could result in an unprecedented increase in volume of a single commodity from a single source area, travelling basically along the same routes, through the same towns, to terminals constructed within the same timeframe. These proposals will have unique concerns such as fugitive coal dust emissions as well as other potential impacts in common. The sudden surfacing of these multiple coal export terminal projects distinguishes these proposals from other types of export facilities that have been built in the region.



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As the Corps is conducting the EA for the Coyote Island Terminal, your agency is also beginning work to prepare two EISs for the two coal export terminal proposals in Washington. I urge the Corps of Engineers to conclude an EIS is also necessary for the Coyote Island project and conduct a full project level EIS that includes a thorough review of cumulative impacts.

I look forward to working together on how our agencies can carry out our responsibilities to the public by ensuring thorough and robust environmental review of projects that could cause significant environmental impact in our region. The communities, environment and economies of our region deserve nothing less.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ted Sturdevant', written in a cursive style.

Ted Sturdevant
Director

Enclosure: Ecology Letter to USACE dated May 7, 2012

cc: Colonel Bruce Estok, US Army Engineer District
Steve Gagnon, Regulatory Branch, US Army Engineer District
Dennis McLerran, EPA Region 10 Administrator
Dick Pederson, Oregon Department of Environmental Quality
Roylene Rides-at-the-Door, Natural Resources Conservation Service, US Department of
Agriculture
Tyler Schroeder, Planning Services Division, Whatcom County
William Stelle, NOAA Northwest Region Administrator
Nancy Sutley, White House Council on Environmental Quality
Mike Tursaski, US Army Engineer District
Michelle Walker, US Army Engineer District
Mike Wojtowicz, Department of Building & Planning, Cowlitz County