



WASHINGTON STATE

Joint Aquatic Resources Permit Application (JARPA) Form ^{1,2} [\[help\]](#)

USE BLACK OR BLUE INK TO ENTER ANSWERS IN THE WHITE SPACES BELOW.



US Army Corps of Engineers
Seattle District

AGENCY USE ONLY	
Date received:	Department of Ecology RECEIVED
Agency reference #:	JUL 18 2016
Parcel # (s) & Environmental Assistance Program	

Part 1–Project Identification

1. Project Name (A name for your project that you create. Examples: Smith's Dock or Seabrook Lane Development) [\[help\]](#)

Millennium Bulk Terminals Longview, LLC (MBT-Longview) Coal Export Terminal

Part 2–Applicant

The person and/or organization responsible for the project. [\[help\]](#)

2a. Name (Last, First, Middle)

Gaines, Kristin K.

2b. Organization (If applicable)

MBT-Longview³ is the lessee of the subject property (Property) and leases those lands from Northwest Alloys, Inc. (NWA). NWA is the owner of the Property and leases certain aquatic lands contiguous to NWA's Property from the Washington Department of Natural Resources (WDNR) subject to aquatic lands lease No. 20-B09222 (leasehold). MBT-Longview also owns the Property's assets and facilities and has a long term ground lease with NWA to occupy, develop and operate the Property. MBT-Longview is also the operator for NWA in the aquatic leasehold area under contract from NWA. MBT-Longview is a local employer with its assets located in and registered to do business in Washington State; it is registered as a Delaware limited liability company.⁴

2c. Mailing Address (Street or PO Box)

MBT-Longview
P.O. Box 2098 / 4029 Industrial Way

¹Additional forms may be required for the following permits:

- If your project may qualify for Department of the Army authorization through a Regional General Permit (RGP), contact the U.S. Army Corps of Engineers for application information (206) 764-3495.
- If your project might affect species listed under the Endangered Species Act, you will need to fill out a Specific Project Information Form (SPIF) or prepare a Biological Evaluation. Forms can be found at <http://www.nws.usace.army.mil/Missions/CivilWorks/Regulatory/PermitGuidebook/EndangeredSpecies.aspx>.
- Not all cities and counties accept the JARPA for their local Shoreline permits. If you need a Shoreline permit, contact the appropriate city or county government to make sure they accept the JARPA.

²To access an online JARPA form with [\[help\]](#) screens, go to http://www.epermilling.wa.gov/site/alias_resourcecenter/jarpa_jarpa_form/9984/jarpa_form.aspx.

For other help, contact the Governor's Office for Regulatory Innovation and Assistance at (800) 917-0043 or help@oria.wa.gov.

³ In 2014, Resource Capital Funds became the majority owner of Ambre Energy North America, Inc., and Ambre Energy North America, Inc. separated from its Australian parent company, Ambre Energy Limited. In April 2015, Ambre Energy North America, Inc. changed its name to Lighthouse Resources, Inc. In June of 2016, former owner Arch Coal sold its membership interest in the MBT-Longview, LLC to Lighthouse; MBT-Longview, LLC is a wholly owned subsidiary of Lighthouse Resources, Inc.

⁴ See attached Washington Secretary of State Certificate of Existence/Authorization of Millennium Bulk Terminals-Longview, LLC.

2d. City, State, Zip			
Longview, WA 98632			
2e. Phone (1)	2f. Phone (2)	2g. Fax	2h. E-mail
(360) 425-2800	()	(360) 636-8340	k.gaines@millenniumbulk.com

Part 3–Authorized Agent or Contact

Person authorized to represent the applicant about the project. (Note: Authorized agent(s) must sign 11b of this application.) [\[help\]](#)

3a. Name (Last, First, Middle)			
Grette, Glenn B.			
3b. Organization (If applicable)			
Grette Associates LLC			
3c. Mailing Address (Street or PO Box)			
151 South Worthen, Suite 101			
3d. City, State, Zip			
Wenatchee, WA 98801			
3e. Phone (1)	3f. Phone (2)	3g. Fax	3h. E-mail
(509) 663-6300	()	(509) 664-1882	glenn@gretteassociates.com

Part 4–Property Owner(s)

Contact information for people or organizations owning the property(ies) where the project will occur. Consider both **upland and aquatic** ownership because the upland owners may not own the adjacent aquatic land. [\[help\]](#)

- Same as applicant. (Skip to Part 5.)
- Repair or maintenance activities on existing rights-of-way or easements. (Skip to Part 5.)
- There are multiple upland property owners. Complete the section below and fill out JARPA Attachment A for each additional property owner. *The Washington State Department of Natural Resources owns certain aquatic lands leased to NWA. See response to Part 2(b). A small portion of the Project Site is currently owned by the Bonneville Power Administration (BPA).*
- Your project is on Department of Natural Resources (DNR)-managed aquatic lands. If you don't know, contact the DNR at (360) 902-1100 to determine aquatic land ownership. If yes, complete JARPA Attachment E to apply for the Aquatic Use Authorization ***Not applying for Aquatic Use Authorization at this time and will be applied for at a later date as required.**

4a. Name (Last, First, Middle)			
Upland Parcel: Stiffler, Mark A.			
4b. Organization (If applicable)			
Northwest Alloys (NWA)			
4c. Mailing Address (Street or PO Box)			

201 Isabella St.			
4d. City, State, Zip			
Pittsburgh, PA 15212			
4e. Phone (1)	4f. Phone (2)	4g. Fax	4h. E-mail
(415) 553-1658	()	()	mark.stiffler@alcoa.com

Part 5–Project Location(s)

Identifying information about the property or properties where the project will occur. [\[help\]](#)

There are multiple project locations (e.g. linear projects). Complete the section below and use [JARPA Attachment B](#) for each additional project location.

5a. Indicate the type of ownership of the property. (Check all that apply.) [help]			
<input checked="" type="checkbox"/> Private <input checked="" type="checkbox"/> Federal <input checked="" type="checkbox"/> Publicly owned (state, county, city, special districts like schools, ports, etc.) Consolidated Diking Improvement District (CDID) #1 has an easement across the dike <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Department of Natural Resources (DNR) – managed aquatic lands (Complete JARPA Attachment E) JARPA Attachment E will *Not applying for Aquatic Use Authorization at this time and will be applied for at a later date as required.			
5b. Street Address (Cannot be a PO Box. If there is no address, provide other location information in 5p.) [help]			
4029 Industrial Way			
5c. City, State, Zip (If the project is not in a city or town, provide the name of the nearest city or town.) [help]			
Longview, WA 98632			
5d. County [help]			
Cowlitz			
5e. Provide the section, township, and range for the project location. [help]			
¼ Section	Section	Township	Range
Project Site: NW, NE SW, SE	35, 36 25, 26	8N 8N	3W 3W
5f. Provide the latitude and longitude of the project location. [help]			
<ul style="list-style-type: none"> Example: 47.03922 N lat. / -122.89142 W long. (Use decimal degrees - NAD 83) 			
Project Site 46.1364 N lat. / -123.0047 W long.			
5g. List the tax parcel number(s) for the project location. [help]			
<ul style="list-style-type: none"> The local county assessor's office can provide this information. 			
619530400, 61950, 61953, WDNR Aquatic Lands Lease #20-B09222, and BPA parcels 61954 and 6195303			
5h. Contact information for all adjoining property owners. (If you need more space, use JARPA Attachment C.) [help]			
Name	Mailing Address		Tax Parcel # (if known)

Port of Longview	PO Box 1258	107190100, 107180100, 107170100, 106970100,
	Longview, WA 98632-7739	106980100, 106990100
Barlow Point Land Company, LLC	PO Box 2098	107140100
	Longview, WA 98362	
Consolidated Diking Improvement District (CDID) #1	5350 Pacific Way	619530201
	Longview, WA 98362	
BNSF Railway Company	PO Box 961089	61951, 61948, WI3100003
	Fort Worth, TX 76161-0089	
USA, administered by Bonneville Power Administration (BPA)	PO Box 3621	61954, 6195303
	Portland, OR 97229	
Weyerhaeuser Company	Local: PO Box 188, Longview, WA 98632	WI3110001, 61947
	Corporate: PO Box 9777, Federal Way, WA 98063-9777	
Additional non-adjacent property owners within 300 feet		
Consolidated Diking Improvement District (CDID) #1	5350 Pacific Way	107080100, 107090100,
	Longview, WA 98632	10219, 10211, 10212, 10220, 10191
Randal/Lisa Bradford	114 Bradford Pl.	106880100
	Longview, WA 98632	
Earl Sullivan	7233 NW Newberry Hill Rd	106870100
	Silverdale, WA 98383-9355	
Louis Alder	PO Box 68	106860100
	Creswell, OR 97426	
BS Land/Gravel LLC	201 W Main	106850100
	Grangeville, ID 83530	
Northwest Alloys, Inc.	PO Box 2098	1021501
	Longview, WA 98632	
USA, administered by Bonneville Power Administration (BPA)	PO Box 3621	1021401
	Portland, OR 97229	
Moeller Land/Cattle Co. INC	187 Route 36, Ste 101	053603500
	West Long Branch, NJ 07764	
Solvay Interlox Inc	3500 Industrial Way	101930100, 053603525
	Longview, WA 98632	
City of Longview	PO Box 128	053603524
	Longview, WA 98632	

5i. List all wetlands on or adjacent to the project location. [help]

Wetlands and ditches are present in the Project footprint (see Sheet 14). Review of on-site wetlands is occurring in conjunction with the USACE and Washington Department of Ecology (Ecology).

Wetlands within the proposed coal export terminal footprint (Project Site) (Parcel 619530400) are described in the *Coal Export Terminal Wetland and Stormwater Ditch Delineation Report-Parcel 619530400* (Grette Associates 2014), and summarized below. A prior operator conducted unpermitted land clearing and/or filling on a portion of the Project Site. Three areas have been identified that were wetlands prior to 2010, but are no longer present as a result of those actions: P1 (4.80 acre), P3 (1.23 acres), and an area that was previously part of Wetland A (2.07 acres). These are characterized as "pre-impact wetlands" in the delineation report. There are five existing wetlands part or all of which are within the Project footprint: Wetland A (6.28 acres), Wetland C (3.38 acres), Wetland Z (11.22 acres), Wetland Y (3.40 acres), and Wetland P2 (2.65 acres).

Wetlands within adjacent MBT-Longview parcels are described in two additional delineation reports. The *Bulk Product Terminal Wetland and Stormwater Ditch Delineation Report-Parcel 61953* (Grette Associates 2014) describes five wetlands in Parcel 61953: Wetland D (5.43 acres), Wetland E (9.46 acres), Wetland F (0.45 acres), Wetland G (2.60 acres) and Wetland H (0.24 acres). The *Bulk Product Terminal Shoreline Wetland Delineation Report-Parcel 61950* (Grette Associates 2014) describes one additional wetland, Wetland X (0.44 acres), located in Parcel 61950. These wetlands all are located outside of the Project footprint.

See the *Coal Export Terminal Wetland and Stormwater Ditch Delineation Report-Parcel 619530400* (Grette Associates 2014) for an overview of the Project Site survey areas.

5j. List all waterbodies (other than wetlands) on or adjacent to the project location. [help]

Columbia River and CDID non-jurisdictional ditches

5k. Is any part of the project area within a 100-year floodplain? [help]

Yes No Don't know

Upland areas are not – they are Zone B; aquatic areas waterward of the dike are Zone A4.

5l. Briefly describe the vegetation and habitat conditions on the property. [help]

Upland Areas

The upland portions of the Project Site footprint have been altered from their natural condition; consisting of developed industrial infrastructure and facilities, constructed contaminant disposal facilities, or undeveloped areas of vegetation with historical hydrology altered by diking, ditching or fill.

Vegetated areas include a capped contaminant disposal facility, which consists of grasses and vetches. Other vegetated portions of the Project Site are predominantly unpaved areas surrounded by industrial infrastructure. Plant species are mostly weedy, and often invasive, including reed canarygrass (*Phalaris arundinacea*), Scot's broom (*Cytisus scoparius*), Canada thistle (*Cirsium arvense*), and bull thistle (*Cirsium vulgare*)

Wetland Areas

See response 5i.

Shoreline Areas

Shoreline vegetation is limited due to extensive diking and riprap along the Columbia River. In some areas at the Project Site, vegetation exists in a narrow strip between the dike and the river. This is primarily composed of willow (*Salix* spp.), red elderberry (*Sambucus racemosa*), cottonwood (*Populus* spp.), rushes (*Juncus* spp.), sedges (*Carex* spp.), and various non-native shrubs and grasses including Himalayan blackberry (*Rubus armeniacus*). In others it is limited to grasses growing on the dike. Submerged areas are almost entirely unvegetated.

Aquatic Habitats

Shallow water habitat exists primarily below elevation +4 feet (ft) Columbia River Datum (CRD) due to the presence of the dike above that elevation. A shallow water flat extends from about +4 ft to -10 ft CRD parallel to the shoreline and varies from approximately 300 to 550 ft in width.

Beyond approximately -10 ft CRD the substrate slope increases, down to between -30 and -40 ft CRD. Because of the steepness of the slope, nearly all of this area is below -20 ft CRD. Deep water substrate is unvegetated silty sand.

5m. Describe how the property is currently used. [\[help\]](#)

The approximately 540-acre Property has been used for industrial and manufacturing activities, including as a Bulk Product Terminal and aluminum processing facility. A high tension power transmission line corridor crosses the Property. The 540-acre Property is bisected by Industrial Way (SR 432). Property on the north side of Industrial way is vacant and vegetated. A portion of the Property south of Industrial Way continues to be used by MBT-Longview for a number of industrial and related activities.

MBT-Longview currently operates a separate terminal for bulk products including: the receipt, storage and transport of alumina from ship to rail or truck; the receipt, storage, and transportation of coal for Weyerhaeuser Company from rail to truck; and could handle other bulk products. The Bulk Product Terminal use will remain as a separate use and will operate independently from the coal export terminal on a separate portion of the Property. MBT-Longview is in the process of further developing the Bulk Product Terminal and is actively seeking potential tenants. If a JARPA for Bulk Product Terminal development is needed, MBT-Longview will file a separate JARPA for those independent activities consistent with 33 C.F.R. §325.1(d).

5n. Describe how the adjacent properties are currently used. [\[help\]](#)

The Port of Longview property (parcels 107109100, 107180100, 107170100, 106970100, 106980100, 106990100) immediately downstream of the Project Site is currently undeveloped but includes electrical line conveyance towers. The CDID property (parcel 619530201) includes structures related to the diking improvement infrastructure. The Barlow Point Land Company property (107140100) is essentially undeveloped. BNSF Railway Company property (parcels 61951, 61948, and WI1300003) are used for a railroad. The BPA properties (parcels 61954 and 6195303) are surrounded by the NWA Property adjacent to Industrial Way and are primarily used as an electrical substation. The Weyerhaeuser Company property (parcels 61947, WI31101) is located upstream from the Project Site. The Weyerhaeuser property has a number of large buildings used in pulp and paper production, and includes a sawmill and a chemical plant.

5o. Describe the structures (above and below ground) on the property, including their purpose(s) and current condition. [\[help\]](#)

There are a number of existing upland structures on the Project Site. These structures house a variety of industrial related activities, including the storage of bulk materials, laboratories, maintenance buildings, and administrative offices. Some of these buildings may be either demolished or repaired as needed.

Within the adjacent Bulk Product Terminal area, Dock 1 is a vessel off-loading facility with an approach trestle that serves only the existing Bulk Product Terminal. The aquatic portion of the proposed coal export terminal Project Site is immediately downstream from Dock 1. There are two pile dikes composed of creosote-treated wooden piles, which are owned and maintained by the USACE that extend from the shoreline towards the navigation channel.

5p. Provide driving directions from the closest highway to the project location, and attach a map. [\[help\]](#)

From Interstate 5, take Exit 36 westbound and take 3rd Avenue industrial exit. Turn left at the end of the off-ramp onto 3rd Avenue (3rd Avenue becomes Industrial Way). Continue approximately 2 miles to the stop light at 38th Avenue and turn left into the NWA/ MBT-Longview facility. The main office is the first building on the right. Please refer to Sheet 1 for a vicinity map.

Part 6–Project Description

6a. Briefly summarize the overall project. You can provide more detail in 6b. [\[help\]](#)

MBT-Longview proposes to build a coal export terminal (Project) on a portion of an existing industrial site in Cowlitz County, Washington (Sheets 1-14). The Project would be located near Longview, WA, adjacent to the Columbia River on land suitably zoned for heavy industrial use (Sheets 1 and 2). The Project Site would cover approximately 190 acres of the approximately 540-acre Property and would consist of rail unloading, storage, reclaiming and loading ships with coal (Sheet 2).

The coal export terminal would be capable of receiving, stockpiling, blending, and loading coal by conveyor onto ships for export⁵. MBT-Longview proposes to develop the Project in two separate stages. In Stage 1, MBT-Longview would construct two docks (Docks 2 and 3), one shiploader and related conveyors on Dock 2, berthing facilities on Dock 3, a stockpile area including two stockpile pads, railcar unloading facilities, one operating rail track, up to eight rail storage tracks for train parking, Project Site area ground improvements, associated facilities and infrastructure, and conduct necessary dredging for the two docks. Stage 1 would be capable of a throughput capacity of nominally 25 million metric tonnes⁶ per year (MMTPY). During construction of Stage 1, a startup facility would unload coal from railcars to ships via conveyors. This startup configuration would have a nominal throughput capacity of approximately 7 - 10 MMTPY. Stage 2 facilities would consist of one additional shiploader on Dock 3, two additional stockpile pads, conveyors, and equipment necessary to increase throughput by approximately 19 MMTPY, to a total nominal throughput of 44 MMTPY. The completed coal export terminal would consist of two docks, ship loading systems, stockpiles and equipment, rail car unloading facilities, an operating rail track, rail storage tracks to park up to eight trains, associated facilities, conveyors, and necessary dredging. The planned total throughput capacity of the full build out facility would be a nominal 44 MMTPY of coal.

Two new docks (Dock 2 and Dock 3) would be constructed specifically for the coal export terminal⁷ (Sheets 2-11). Dredging is required to provide access to and from the Columbia River navigation channel, berthing at Docks 2 and 3, and to provide an adequate turning basin in the vicinity of Docks 2 and 3 (Sheets 12 and 13).

NWA and/or MBT-Longview will seek any additional authorizations necessary from the WDNR prior to the installation of the facilities. In addition, MBT-Longview will continue to work with Ecology to develop the coal export terminal consistent with the Model Toxics Control Act and Ecology's Brownfields Policy which calls for coordinated cleanup and redevelopment of industrial sites.

Stages 1 and 2 will be permitted under a single USACE authorization. Ship loading facilities for Stages 1 and 2 will be permitted under separate shoreline substantial development permits. Application has been made to Cowlitz County for a Shoreline Substantial Development Permit to construct Docks 2 and 3, and to install shiploading facilities on Dock 2. Application has also been made to the County for a Shoreline Conditional Use Permit for dredging within the shoreline portion of the river. This dredging would allow ship access from the Columbia River navigation channel and berthing at Docks 2 and 3. Stage 2 ship loading facilities, to be located on Dock 3, are not included in the current Shoreline Substantial Development Permit application to Cowlitz County.

Project Overview – Stage 1

All coal would be delivered to the terminal by rail on the existing Reynolds Lead spur track which extends along Industrial Way to the Project Site. At the terminal, the rail line would branch into a rail loop system where coal trains would be directed to the coal unloading station.

⁵ The docks are not designed for transloading coal from barges to ocean-going vessels.

⁶ A metric tonne weighs 2,204.62 pounds. A "short ton" weighs 2,000 pounds. A metric tonne equals 1.1023 short tons. Aside from incoming rail shipments which are designated and referred to as "short tons", all other tonnages are in metric tonnes.

⁷ The existing Bulk Product Terminal facility (Dock 1) is a separate and independent operation from the coal export terminal. MBT-Longview intends to further develop the Bulk Product Terminal and is actively seeking additional tenants. This continued and expanded use of the Bulk Product Terminal is unrelated to the current proposal. If needed, MBT-Longview will file a separate JARPA for these independent activities consistent with 33 C.F.R. §325.1(d).

At the unloading station, two railcars at a time would be positioned inside the fully enclosed metal clad unloading building where they would be rotated to discharge the material from the cars into a large hopper. The hopper would feed coal onto a conveyor at a nominal rate of 7,500 tonnes per hour.

During startup, the unloading would occur using a rapid discharge (bottom) unloader (see Sheet 2 for location). The rapid discharge unloader would be retained after startup and may be used in addition to or in lieu of the rotary unloader.

In addition to the main operating track for unloading, an additional eight storage tracks would be provided to store arriving and departing trains. The eight storage tracks would allow trains to travel directly onto the Project Site from the Reynolds Lead.

At the stockpile pads, rail mounted luffing/slewing "stackers" would place coal in pre-designated pad areas. Different types of coal would be stacked into separate stockpiles. Coal would be retrieved from the stockpile pads by rail mounted "bucket-wheel reclaimers" and then conveyed directly to the ship loading facility. Different coal types could be blended together after reclaiming by loading two different coal types onto the shipping conveyor.

Coal would be loaded onto ships at the docks by shiploaders. The Stage 1 facility would have one shiploader. The shiploader and its associated system of conveyors, surge bin and transfer stations would collectively be referred to as a shiploading stream. Surge bins may facilitate continuous coal reclaiming and transfer during the changing of ship hatches by the shiploader. The average time to load and dispatch a ship would be less than 24 hours.

During Stage 1 operations, the shiploader would be constructed and operated on Dock 2. During Stage 1, Dock 3 would operate only as a berthing dock (Sheets 2 and 3).

Physical Components –Stage 1

The main elements of Stage 1 development would include:

- Rail bed;
- Rail loop with arrival and departure tracks to include one operating track (turn around track) and eight rail storage tracks;
- One tandem rotary unloader (capable of unloading two rail cars) for operations, and one tandem rapid discharge unloader to be used during startup and maintenance;
- Two coal stockpile pads, Pads A and B;
- Two rail-mounted luffing/slewing "stackers" and associated facilities for Pads A and B;
- Two rail mounted "bucket-wheel reclaimers" and associated facilities for Pads A and B;
- Two shipping Docks (Dock 2 and Dock 3), one shiploader and associated facilities on Dock 2;
- Conveyors, transfer stations and surge bin from the stockpile pads to the shiploading facilities;
- In-bound and out-bound coal sampling stations;
- Support structures, electrical transformers, switchgear and equipment buildings, process control systems; and
- Upland facilities including roadways, service buildings, water management facilities, utility infrastructure, and other ancillary facilities.

Project Overview – Stage 2

The completed Stage 2 construction would expand the coal export terminal with the addition of a shiploader on Dock 3 and the construction of stockpile pads C and D, with the associated coal handling equipment. The planned total throughput capacity of the facility would be 44 MMTPY of coal.

Physical Components – Stage 2

The main elements of Stage 2 development would include:

- Associated conveyors and transfer stations to the stockpile Pads C and D from the rail receiving station;
- Two additional coal stockpile pads, Pads C and D;
- Two additional rail-mounted luffing/slewing “stackers” and associated facilities;
- Two additional rail mounted “bucket-wheel reclaimers” and associated facilities;
- One additional shiploader and associated facilities on Dock 3; and
- Conveyors, transfer stations and surge bins from stockpile Pads C and D to the shiploading facilities.

Please see Response 6d below for listing of major elements.

6b. Describe the purpose of the project and why you want or need to perform it. [help]

The proposal’s objectives are to (1) make use of existing rail infrastructure (freight corridors) and an efficient, direct shipping route to Asia; and (2) reuse and redevelop an existing industrial terminal into an American Pacific Coast export terminal in Cowlitz County capable of exporting up to 44 MMTY of coal to meet international demand.

6c. Indicate the project category. (Check all that apply) [help]

- Commercial
 Residential
 Institutional
 Transportation
 Recreational
 Maintenance
 Environmental Enhancement

6d. Indicate the major elements of your project. (Check all that apply) [help]

<input type="checkbox"/> Aquaculture	<input type="checkbox"/> Culvert	<input type="checkbox"/> Float	<input type="checkbox"/> Retaining Wall (upland)
<input type="checkbox"/> Bank Stabilization	<input type="checkbox"/> Dam / Weir	<input type="checkbox"/> Floating Home	<input checked="" type="checkbox"/> Road
<input type="checkbox"/> Boat House	<input checked="" type="checkbox"/> Dike / Levee / Jetty	<input type="checkbox"/> Geotechnical Survey	<input type="checkbox"/> Scientific Measurement Device
<input type="checkbox"/> Boat Launch	<input type="checkbox"/> Ditch	<input checked="" type="checkbox"/> Land Clearing	<input type="checkbox"/> Stairs
<input type="checkbox"/> Boat Lift	<input checked="" type="checkbox"/> Dock / Pier	<input type="checkbox"/> Marina / Moorage	<input checked="" type="checkbox"/> Stormwater facility
<input type="checkbox"/> Bridge	<input checked="" type="checkbox"/> Dredging	<input type="checkbox"/> Mining	<input type="checkbox"/> Swimming Pool
<input type="checkbox"/> Bulkhead	<input type="checkbox"/> Fence	<input type="checkbox"/> Outfall Structure	<input checked="" type="checkbox"/> Utility Line
<input type="checkbox"/> Buoy	<input type="checkbox"/> Ferry Terminal	<input checked="" type="checkbox"/> Piling/Dolphin	
<input type="checkbox"/> Channel Modification	<input type="checkbox"/> Fishway	<input type="checkbox"/> Raft	

Other: Construct coal stockpiling, handling, and conveyor facilities

6e. Describe how you plan to construct each project element checked in 6d. Include specific construction methods and equipment to be used. [help]

- Identify where each element will occur in relation to the nearest waterbody.
- Indicate which activities are within the 100-year floodplain.

DREDGING AND FLOW LANE DISPOSAL

Dredging is required to accommodate berthing of fully-loaded Panamax class ships at Docks 2 and 3. Existing depths in the berth areas range from -28 to -42 ft CRD and the side slope areas are typically deeper than -20 ft CRD (Sheets 12 and 13).

MBT-Longview proposes to dredge to a berthing depth of -43 ft CRD with an additional two-foot overdredge allowance (Sheets 12 and 13). All areas of proposed dredging are located over 500 ft from ordinary high water (OHW). The side slopes would be dredged at 3H:1V to transition to the existing mudline. This would allow a depth of at least -43 ft CRD to be achieved up to the dock face for the entire length of the berth. In order to account for deposition that may occur between permit submittal and construction, MBT-Longview is requesting authorization for dredging and disposal of up to 500,000 cubic yards from within the project footprint to allow for

a volume of deposition equal to 10 percent of the volume of the dredge prism shown on Sheets 12 and 13. Actual dredging would be limited to that volume necessary to accomplish the depth, overdredge, and area requirements shown on Sheets 12 and 13.

In addition to this initial dredging approval, MBT-Longview also seeks authorization to the extent required to perform routine maintenance dredging consistent with the proposed dredge prism dimensions. Based on sediment accretion rates measured in the berth at Dock 1, it is expected that accretion in the Docks 2 and 3 berthing/navigation basin could represent an annual volume of between approximately 5,000 and 24,000 cubic yards. Maintenance dredging is therefore anticipated to occur on a multi-year basis, or as-needed following extreme-flow events. The Project as proposed would include a 10-year maintenance dredge program for Docks 2 and 3 to dredge up to 100,000 cubic yards of infill as frequently as annually in order to maintain the depths authorized during deepening.

The area indicated on the attached drawings is proposed for Dock 2 and Dock 3. The sediment to be dredged for the coal export terminal will be characterized and evaluated by the regional Dredged Material Management Program (DMMP) for suitability for flow lane disposal. Material to be dredged is anticipated to be comprised of silty sand, which is typical of the Project area and general facility. Material has been dredged for the Bulk Product Terminal at Dock 1, located immediately upstream of the Project Site location for the coal export terminal's two docks. Based on the acceptability of the sediment from the Dock 1 site for flow lane disposal, it is anticipated that all of the material to be dredged for Docks 2 and 3 would be suitable for flow lane disposal.

Dredging would be conducted using a barge-mounted mechanical clamshell dredge with material loaded into a bottom-dump barge for transport to the flow lane disposal site once the barge is full. This method does not require dewatering. The location of the flow lane disposal site will be determined by the Portland District of the USACE. Once in place over the disposal area, the operator would open the barge and release the material. Due to the draft of the barge, material would be released below the water surface. Dredging also may be conducted using a hydraulic dredge with flow lane disposal as described for mechanical clamshell dredging.

Overall, dredging and disposal may occur over one or two construction seasons. Because the Project Site will continue to be subject to river sediment deposition, future maintenance dredging is anticipated on a one to two year basis to maintain adequate berthing and navigation depths for this facility (-43 ft CRD). The area and volume of maintenance dredging would be determined as-needed.

To avoid and minimize potential impacts, the Project includes flow lane disposal of dredged material to keep the dredged material in aquatic areas and maintain sediment transport processes within the Columbia River system. Use of dredged materials would be used otherwise only as part of agency-approved mitigation.

DOCK AND TRESTLE CONSTRUCTION

In-Water Work

Most of the approach trestle and the entire dock structure would be located waterward of OHW and require in-water and above-water construction. In-water dock and trestle construction would primarily involve pile driving.

A 125-foot section of the downstream pile dike would be removed to accommodate the dredge prism (Sheet 2). A 100-foot section of the upstream pile dike would be removed to accommodate Docks 2 and 3 (Sheet 2).

Pile Driving

Construction of the approach trestle and Docks 2 and 3 would require both impact and vibratory pile driving. Based on the current design, this analysis assumes the installation of up to 630 36-inch steel pile. Of this total, up to 610 would be installed below ordinary high water and up to 20 would be installed above ordinary high water (Sheets 3 through 7). Each pile would require use of both vibratory and impact pile drivers.

Pile driving may require more than one in-water work window.

Above-water Work

Above-water work would include finishing the dock structures and installation of the materials handling infrastructure.

Concrete dock components including pile caps, stringers, and decking would consist of both cast-in-place and pre-cast components. Placement of pre-cast components, such as trestle girder "tees", would be accomplished using barge-based construction equipment. Many concrete components (such as the Docks 2 and 3 decking, crane rails, and pile caps) would need to be cast in place. Appropriate techniques and best management practices (BMPs) would limit potential for uncured concrete coming in contact with surface water. Remaining above-water work including finishing fender systems, railings, etc. would be completed using a combination of barge- and dock-based equipment, as needed.

Materials handling infrastructure including shiploaders and conveyors would be delivered by barge and off-loaded by crane directly to the docks and trestle. Barges would not offload materials, equipment, or anything else on the beach. As much as practicable, infrastructure would be pre-fabricated so that above-water work would largely consist of installation.

Utilities including sanitary sewer, potable water, fire water, process water, electrical, compressed air, telecommunications, and other wiring utilities would be attached to the trestle and dock structure. A water collection system would also be attached to the trestle and dock structure. A small comfort station would be constructed where the trestle meets the dock to provide restroom and meal room facilities on the dock. A pump system would be included to convey sewage from the dock to a conveyance system on the upland portion of the Project Site which will connect to the City of Longview's sewage collection system.

It is anticipated that completion of the above-water portion of the dock structures and installation of the marine terminal infrastructure would take place both during and outside of authorized in-water work periods.

PERMANENT ALTERATIONS

The dredge prism is located below -20 ft CRD. While dredging would remove material and temporarily disturb the area (Table 1), there would be no significant habitat conversion (e.g., shallow water habitat converted to deep water habitat) resulting from that action. Maintenance dredging would result in future periodic disturbance in this area.

Construction of the approach trestle and docks would result in a permanent structure in aquatic areas (Table 1). Less than 5 percent of pile and less than 10 percent of overwater cover would be in areas shallower than -20 ft CRD.

Table 1. Permanent alterations from project activities (aquatic).

Element	above -20 ft CRD	below -20 ft CRD	total
Dredge Prism (volume/area)	0/0	500,000 ¹ cubic yards / 48 acres	500,000 ¹ cubic yards/ 48 acres
Pile (36-inch), count	Approximately 30	Approximately 580	up to 610 ²
Pile, area	211 ft ²	4,100 ft ²	4,311 ft ²
Overwater cover, total	0.30 acres	4.83 acres	5.13 acres

¹Includes 10% additional volume to account for deposition prior to dredging.

²Up to 630 total piles; up to 610 would be below ordinary high water and up to 20 would be in the upland.

SHORELINE ELEMENTS

Of the actions described above, only a subset would occur in Cowlitz County jurisdictional shoreline areas (200 ft landward of OHW, all areas waterward of OHW). These include:

Stage 1

- 220 linear ft of land-based conveyor delivering material to the approach trestle;
- Two conveyor belt pile-supported foundations;
- The entire approach trestle, including abutment and areas above OHW;
- The entire Dock 2 and 3 structures;
- One shiploader;
- The entire dredge prism; and
- 230 linear ft of new asphalt road to provide access to the trestle. This includes improvements to existing roads accessing the levee and a small vehicular turnaround. This area is entirely above OHW. The road would require approximately 1,200 cubic yards of fill.

Stage 2

- A second conveyor; and
- A second shiploader.

OPERATIONS

The facility would be designed for 24-hour operation, seven days per week. During Stage 1 operations, approximately one vessel per day would be loaded. At maximum throughput (Stage 2), approximately two vessels per day would be loaded. The docks are not designed for transloading coal from barges onto ocean-going vessels.

Prior to or during loading, vessels would discharge ballast water. It is expected that vessels calling at the Project Site would have exchanged or treated ballast water prior to discharge in accordance with state and federal regulations. Vessels would not typically withdraw ballast water from the Columbia River.

The approach trestle and Docks 2 and 3 would be adequately lighted to meet worker safety requirements to allow 24-hour operation.

6f. What are the anticipated start and end dates for project construction? (Month/Year) [help]

- If the project will be constructed in phases or stages, use [JARPA Attachment D](#) to list the start and end dates of each phase or stage.

Start date: immediately upon receipt of permits

End date: Approximately 5 to 8 years after the start date to allow for the construction of both Stage 1 and Stage 2

See JARPA Attachment D

6g. Fair market value of the project, including materials, labor, machine rentals, etc. [help]

\$680 million total project; approximately \$200 million for elements within the shoreline zone.

6h. Will any portion of the project receive federal funding? [help]

- If yes, list each agency providing funds.

Yes No Don't know

Part 7–Wetlands: Impacts and Mitigation

- Check here if there are wetlands or wetland buffers on or adjacent to the project area.
(If there are none, skip to Part 8.) [help]

7a. Describe how the project has been designed to avoid and minimize adverse impacts to wetlands. [help]

Not applicable

The project is proposed on a brownfields site with existing rail service. Therefore, wetland impacts are occurring at an existing degraded site and are avoided at greenfield sites consistent with wetlands mitigation policy, Shorelines Management Policies, local zoning and growth management direction to focus industrial development on properly zoned, designated and, where possible, previously developed shorelines. This Project Site has all those favorable attributes for industrial development.

7b. Will the project impact wetlands? [\[help\]](#)

Yes No Don't know

7c. Will the project impact wetland buffers? [\[help\]](#)

Yes No Don't know

7d. Has a wetland delineation report been prepared? [\[help\]](#)

- If Yes, submit the report, including data sheets, with the JARPA package.

Yes No

A wetland delineation report has been prepared for this Project and submitted to the USACE, Ecology, and Cowlitz County. See the *Coal Export Terminal Wetland and Stormwater Ditch Delineation Report-Parcel 619530400* (Grette Associates 2014).

7e. Have the wetlands been rated using the Western Washington or Eastern Washington Wetland Rating System? [\[help\]](#)

- If Yes, submit the wetland rating forms and figures with the JARPA package.

Yes No Don't know

The wetland delineation report includes ratings forms and figures.

7f. Have you prepared a mitigation plan to compensate for any adverse impacts to wetlands? [\[help\]](#)

- If Yes, submit the plan with the JARPA package and answer 7g.
- If No, or Not applicable, explain below why a mitigation plan should not be required.

Yes (*in prep*) No Not applicable

A comprehensive Mitigation Plan is being prepared in coordination with USACE and Ecology to address the impacts to wetlands and aquatic habitats resulting from the Project. The Mitigation Plan will address the general requirements for mitigation planning outlined in the USACE's 2008 mitigation guidance. Mitigation actions may be implemented at one or multiple locations to ensure that a wide range of ecological functions are provided to offset identified Project impacts. The mitigation actions may include use of credits from existing or proposed mitigation banks in addition to applicant-sponsored mitigation actions. Historical habitat types in the Project vicinity will be used as templates for designing mitigation actions. This will include careful consideration of the influence of physical processes on habitat succession and function.

7g. Summarize what the mitigation plan is meant to accomplish, and describe how a watershed approach was used to design the plan. [\[help\]](#)

Mitigation will compensate for the unavoidable, permanent loss of wetlands on the Project Site and address the watershed approach used in developing the plan.

7h. Use the table below to list the type and rating of each wetland impacted, the extent and duration of the impact, and the type and amount of mitigation proposed. Or if you are submitting a mitigation plan with a similar table, you can state (below) where we can find this information in the plan. [\[help\]](#)

Activity (fill, drain, excavate, flood, etc.)	Wetland Name ¹	Wetland type and rating category ²	Impact area (sq. ft. or Acres)	Duration of impact ³	Proposed mitigation type ⁴	Wetland mitigation area (sq. ft. or acres)
Pre-Impact Wetlands						
Fill, partial (prior to 2010)	Wetland A	III	2.07 (of 8.35)	permanent	in prep	in prep

Fill, complete (prior to 2010)	Wetland P1	III	4.80	permanent	in prep	in prep
Fill, complete (prior to 2010)	Wetland P3	IV	1.23	permanent	in prep	in prep
Existing Wetlands						
Fill, complete	Wetland A	III	6.28	permanent	in prep	in prep
Fill, complete	Wetland C	III	3.38	permanent	in prep	in prep
Fill, complete	Wetland Z	III	11.22	permanent	in prep	in prep
Fill, partial	Wetland Y	III	0.57 (of 3.40)	permanent	in prep	in prep
Fill, complete	Wetland P2	IV	2.65	permanent	in prep	in prep
Jurisdictional Areas that are not Wetlands						
Fill, partial	conveyance ditches	n/a	5.17 (of 7.15)	permanent	in prep	in prep

¹ If no official name for the wetland exists, create a unique name (such as "Wetland 1"). The name should be consistent with other project documents, such as a wetland delineation report.

² Ecology wetland category based on current Western Washington or Eastern Washington Wetland Rating System. Provide the wetland rating forms with the JARPA package.

³ Indicate the days, months or years the wetland will be measurably impacted by the activity. Enter "permanent" if applicable.

⁴ Creation (C), Re-establishment/Rehabilitation (R), Enhancement (E), Preservation (P), Mitigation Bank/In-lieu fee (B)

Page number(s) for similar information in the mitigation plan, if available:

The mitigation plan is in preparation, impact summaries are on page 10 of the *Coal Export Terminal Wetland Impact Report (Grette Associates 2014)*, submitted to USACE

7i. For all filling activities identified in 7h, describe the source and nature of the fill material, the amount in cubic yards that will be used, and how and where it will be placed into the wetland. [\[help\]](#)

Prior to 2010, fill was placed in 8.10 acres of wetlands by a previous operator (pre-impact wetlands). For the Project, fill would be placed in 24.10 acres of wetlands and 5.17 acres of conveyance ditches. The total area of jurisdictional fill including all three categories is 37.37 acres. The volume of fill will be up to approximately 200,000 cubic yards within existing wetlands, up to approximately 70,000 cubic yards within stormwater conveyance features, and up to approximately 20,000 cubic yards within pre-impact wetlands. This assumes one foot excavation within existing wetlands (C, Y, Z, P2, and a portion of A) and stormwater conveyance features (discussed below), then fill to approximate design elevation. However, all wetlands and stormwater conveyance features listed above will be completely filled.

7j. For all excavating activities identified in 7h, describe the excavation method, type and amount of material in cubic yards you will remove, and where the material will be disposed. [\[help\]](#)

Up to approximately 40,000 cubic yards of material may be excavated from existing wetlands and up to approximately 10,000 cubic yards from existing stormwater conveyance features for structural reasons. This assumes one foot of excavation. No excavation is assumed in pre-impact wetlands (P1, P3, and a portion of A).

Part 8–Waterbodies (other than wetlands): Impacts and Mitigation

In Part 8, "waterbodies" refers to non-wetland waterbodies. (See Part 7 for information related to wetlands.) [\[help\]](#)

Check here if there are waterbodies on or adjacent to the project area. (If there are none, skip to Part 9.)

8a. Describe how the project is designed to avoid and minimize adverse impacts to the aquatic environment. [\[help\]](#)

Not applicable

SITE PLANNING

Avoidance and minimization of adverse aquatic impacts has been central to Project Site and terminal design and operations planning, and would be a primary consideration during construction in aquatic areas. Unavoidable impacts would be mitigated consistent with USACE 2008 guidance (see subsequent responses in this section).

Upland construction would be almost entirely set back landward of the shoreline zone (200 ft landward OHW), except for portions of the conveyor and trestle, and also a small segment of access road. This would minimize disturbance adjacent to aquatic areas.

Stormwater, sediment and erosion control BMPs would be installed in accordance with the Stormwater Management Manual for Western Washington and Cowlitz County. Construction would be performed in accordance with the requirements of the Construction Stormwater General Permit. Drainage systems would be designed such that runoff within the construction area would be collected, and treated as necessary, before reuse or discharge. The treatment facility could treat surface runoff and process/construction waters with capacity to store the water for reuse. Treatment may be as required to meet reuse quality or Ecology requirements for offsite discharge.

Drainage systems would be designed such that runoff within the Project Site would be collected for treatment before reuse or discharge. BMPs that would be part of the facility design to maximize the availability of water for reuse include:

- Enclosed conveyor galleries;
- Enclosed rotary unloader building and transfer towers;
- Washdown collection sumps for settlement of sediment;
- Regular cleanout and maintenance of washdown collection sumps;
- Containment around refueling, fuel storage, chemicals and hazardous materials;
- Oil / water separators on drainage systems and vehicle washdown pad;
- Requirement that all employees and contractors receive training, appropriate to their work activities, in the Project Site BMPs;
- Design of docks to contain spillage, with rainfall runoff and washdown water contained and pumped to the upland water treatment facilities; and
- Design of system to collect and treat all runoff and washdown water for either reuse for onsite (dust suppression, washdown water or fire system needs) or discharged offsite.

The water treatment facility would be designed to treat all surface runoff and process water with capacity to store the water for reuse. Treatment would be as required to meet reuse quality or Washington State Department of Ecology (Ecology) requirements for offsite discharge.

Additional water storage would be provided within the coal storage area in the event of a larger storm event. Water volumes exceeding the demands for reuse would be discharged offsite via the existing Outfall 002A into the Columbia River. Water released offsite would be treated and would meet the requirements of Ecology and required discharge permits.

MBT-Longview proposes to tie the water management system into existing facilities, monitored through a separate NPDES Permit:

- **Facility 73.** Facility 73 is MBT-Longview's stormwater treatment system used for achieving the Property's water quality standards required by MBT-Longview's NPDES permit. Facility 73 is located in the southwest portion of the Property (Basins 6 and 1 in Figure 1) and consists of a 1.98 million gallon settling pond, oil and grease removal, multi-media filters, and a discharge pump station (Pump Station C). The settling pond is sized to handle flows up to 6,000 gpm (8.64 MGD). The settling pond is equipped with an oil and grease removal system before the pond's discharge weir. Flows exiting the settling pond are discharged through a 20-inch line to Pump Station C. Pump Station C includes three alternating pumps with a combined discharge capacity of 6,000 gpm under peak flow conditions. Pump Station C pumps the water through an 18-inch line where an in-line turbidity monitor located down-stream measures the outgoing water's turbidity.

If the turbidity reading is below the turbidity set point, the water in the 18-inch line discharges into the 30-inch Outfall 002A line. If the turbidity reading is above the turbidity set point, a solenoid valve routes the water through multi-media filters before tying back into the 18-inch line for discharge to the Outfall 002A line.

- **Columbia River Outfall 002A.** Outfall 002A is a 30-inch outfall to the Columbia River that discharges the water it receives from Facility 73 (the Property's stormwater treatment system). The average amount of stormwater runoff generated by the basins discharging to Outfall 002A is 166.3 MGY.

The coal export terminal Project would obtain a separate NPDES permit, and would develop a separate system of stormwater collection and discharge, as part of the coal export terminal Water Management System. The footprint of Project would absorb some of MBT-Longview's existing drainage basins, effectively eliminating a portion of the runoff volume that is presently handled under MBT-Longview's existing NPDES permit. Excess from the Project area would be collected and treated within the coal export terminal area, then routed to a new internal outfall (monitored under a separate NPDES Permit). The outfall would tie into the existing Facility 77 sump, and all waters from MBT-Longview would go through Facility 73. MBT-Longview's existing discharge line from Facility 73 will continue to discharge to the Columbia River through the existing Outfall 002A.

No portion of the Project Site, with the exception of a portion of the access overpass and frontage improvements, would drain to the CDID ditches. The ditches would remain as they exist today.

The coal export terminal Water Management System is described as follows:

- Stormwater and surface water (wash down water) would be collected from the stockpile areas, rail loop, office areas, the dock and other paved surfaces within the coal export terminal Project Site and directed to a series of vegetated ditches and ponds, then to a collection basin or sump.
- The collected water would be pumped to an onsite treatment facility consisting of settling pond(s) with flocculant addition to promote settling as required.
- The water would then be pumped to a surface storage pond. The surface storage pond would have an approximate capacity of 3.6 million gallons (MG) and would be used to store the water for reuse. The capacity of the pond would include a reserve of 0.36 MG for fire suppression.

The stored water would be reused for dust suppression, wash down and cleanup, and fire suppression. Water for dust suppression would be applied on the main stockpiles, within unloading and conveying systems, and at the dock. Excess water from dust suppression and wash down would be collected for reuse.

It is anticipated that approximately 1,200 gallons per minute (gpm) during wet seasons and approximately 2,000 gpm during the dry season, or 663 million gallons per year (MGY), would be needed on average for dust suppression. Water from the existing onsite wells would provide approximately 635 gpm (334 MGY) to maintain minimum water levels in the storage pond. Water from the storage pond would also be used for the fire hydrant, sprinklers and deluge systems, watering of landscaping and other non-recyclable uses.

The collected excess water would be conveyed to an onsite treatment and storage facility. The water being reused would be brought to Washington State Class A Reclaimed Water standards. Excess treated water from the storage pond would be directed to a collection basin, treated and tested prior to being discharged through the Project's internal NPDES permitted outfall to MBT-Longview's storm and waste water collection and treatment system, then finally discharged through Outfall 002A to the Columbia River. Discharge of water from the Project would be most likely to occur during the rainy season months of October through April.

The aquatic portions of the facility have been designed to minimize disturbance and permanent structure in nearshore/shallow water areas: it is as narrow as possible given structural and conveyor requirements, elevated well above OHW which minimizes shading in shoreline and shallow areas. Docks 2 and 3 would be located over 600 ft offshore in water that is all currently below -20 ft CRD. No dredging would occur in areas landward of -20 ft CRD.

CONSTRUCTION

Minimization measures as well as design considerations and activity-specific work windows for this project are described in *Docks 2 and 3 and Associated Trestle: Proposed Mitigation Measures to Minimize Construction and Long-Term Effects (Grette Associates 2014)*, which has been submitted to the USACE as well as Ecology during the EIS process. These measures have been incorporated into the design of this Project to avoid or minimize effects to listed species, and are provided generally below. The final list of minimization measures will include any measures incorporated during the SEPA and NEPA EIS processes as well as permit conditions.

Construction Water Quality

Standard BMPs for working in aquatic areas would be followed to maintain acceptable construction water quality conditions, including but not limited to maintaining appropriate standards for construction-related turbidity and minimizing the risks of unintended discharges of materials such as fuel or hydraulic fluid.

Pile Driving

To minimize the potential for injury or disturbance to fish related to pile driving, the contractor would drive pile to the greatest extent possible using a vibratory hammer. Final driving and/or proofing will require an impact hammer to achieve bearing strength, depending upon the level of embedment achieved during vibratory installation. To reduce sound pressure levels from impact hammer operations, MBT-Longview's contractor would use a confined bubble curtain system or similar system during impact hammering.

Flow Lane Disposal

MBT-Longview is specifying flow lane disposal in order to support downstream sediment transport processes. The USACE will designate an appropriate flow lane disposal site for this Project, ensuring coordination with any other flow lane disposal actions occurring in this region of the lower Columbia River.

Project Timing

MBT-Longview has developed a series of activity-specific work windows that are designed to minimize specific impact mechanisms as they affect individual species (or populations within those species) of concern. These proposed work windows are protective of the species of concern while providing feasible construction periods for the in-water portion of the Project over a two-year schedule.

OPERATIONS

Lighting would be directed to the work surfaces to minimize light on aquatic habitat.

Project Site stormwater would be managed according to Cowlitz County requirements. Dust suppression systems and use of enclosed conveyors and transfer points would minimize potential for fugitive dust to reach surface water. MBT-Longview would be responsible for creating and following an operational Spill Prevention, Control, and Countermeasures Plan.

The above-water operations would involve conveying coal from land to the docks where it would be loaded onto waiting vessels. A surface water drainage system would be installed to provide water quality treatment for frequent storm events in accordance with Ecology BMPs. Impacts to surface water from dust and coal spills in overwater areas would be controlled through the adherence to the applicable regulations for the reduction or control of dust emissions. The trestle conveyor is anticipated to be fully enclosed, which would eliminate the risk of coal spills, and minimize the impact from dust and untreated stormwater runoff. The dock and trestle coal handling infrastructure design also include methods to collect and treat spills if they were to occur.

Cleanup of any spills would be carried out in compliance with applicable regulations.

MAINTENANCE DREDGING

Maintenance dredging would be conducted at the lowest frequency practicable in order to minimize substrate disturbance. Maintenance dredging is not anticipated to disturb areas shallower than -20 ft CRD.

8b. Will your project impact a waterbody or the area around a waterbody? [\[help\]](#)

Yes No

8c. Have you prepared a mitigation plan to compensate for the project's adverse impacts to non-wetland waterbodies? [\[help\]](#)

- If Yes, submit the plan with the JARPA package and answer 8d.
- If No, or Not applicable, explain below why a mitigation plan should not be required.

Yes (*in prep*) No Not applicable

A comprehensive Mitigation Plan is being prepared in coordination with USACE and Ecology to address the impacts to wetlands and aquatic habitats resulting from the Project.

8d. Summarize what the mitigation plan is meant to accomplish. Describe how a watershed approach was used to design the plan.

- If you already completed 7g you do not need to restate your answer here. [\[help\]](#)

Mitigation will compensate for the unavoidable, permanent impacts to aquatic areas including shading and habitat displaced by the footprint of the piles in shallow areas.

8e. Summarize impact(s) to each waterbody in the table below. [\[help\]](#)

Activity (clear, dredge, fill, pile drive, etc.)	Waterbody name ¹	Impact location ²	Duration of impact ³	Amount of material (cubic yards) to be placed in or removed from waterbody	Area (sq. ft. or linear ft.) of waterbody directly affected
Pile Installation (sound)	Columbia River	in	during construction	n/a	Sound is anticipated to propagate in-water to where it intersects with a landmass.
Pile (permanent footprint)	Columbia River	in	permanent	Up to 610 piles	Up to 4,311 ft ²
Overwater cover	Columbia River	over	permanent	n/a	5.13 acres total
Dredging and flow lane disposal	Columbia River	in	during construction	500,000 cy – does not include future maintenance dredging volumes	48 acres
Flow lane disposal	Columbia River	in	during construction	500,000 cy – does not include future maintenance dredging volumes	Estimated disposal area 80 to 110 acres
Above-water work	Columbia River	over	during construction	n/a	n/a
Maintenance dredging	Columbia River	in	post-construction, periodic	dependent on deposition rates	48 acres (to maintain dredged prism)

¹ If no official name for the waterbody exists, create a unique name (such as "Stream 1") The name should be consistent with other documents provided.

² Indicate whether the impact will occur in or adjacent to the waterbody. If adjacent, provide the distance between the impact and the waterbody and indicate whether the impact will occur within the 100-year flood plain.

³ Indicate the days, months or years the waterbody will be measurably impacted by the work. Enter "permanent" if applicable.

8f. For all activities identified in 8e, describe the source and nature of the fill material, amount (in cubic yards) you will use, and how and where it will be placed into the waterbody. [\[help\]](#)

Dredged material (500,000 cy) would be disposed of in the Columbia River flow lane at location to be designated by the USACE. USACE recently designated a 6.9-acre area for disposing 31,300 cy of dredged material from the Dock 1 berth; therefore it is estimated the flow lane disposal area designated would be between 80 and 110 acres based on a similar ratio of volume to acreage.

8g. For all excavating or dredging activities identified in 8e, describe the method for excavating or dredging, type and amount of material you will remove, and where the material will be disposed. [\[help\]](#)

Approximately 500,000 cy of river sand material would be removed by mechanical clamshell methods. This dredged material would be disposed of via flow lane disposal in the Columbia River, at the location selected by the USACE. Material would be disposed using a bottom-dump barge. The planned dredged volume based on the prism shown in Sheet 12 is 450,000 CY. The applicant is conservatively adding approximately 10 percent to that to account for river deposition that may occur prior to construction.

Part 9–Additional Information

Any additional information you can provide helps the reviewer(s) understand your project. Complete as much of this section as you can. It is ok if you cannot answer a question.

9a. If you have already worked with any government agencies on this project, list them below. [help]			
Agency Name	Contact Name	Phone	Most Recent Date of Contact
USACE	Danette Guy	(360) 906-7274	6/27/2016
	Michelle Walker	(206) 764-6915	6/27/2016
	Dave Martin	(206) 764-6848	6/27/2016
	Tristan Brown	(206) 764-3733	6/27/2016
WDNR	Megan Duffy	(360) 902-1000	3/17/2016
	Kristin Swenddal	(360) 902-1786	3/17/2016
	Matt Niles	(360) 740-6812	3/17/2016
WDFW	Steve West	(360) 906-6720	7/12/2016
WA Dept. of Ecology	Sally Toteff	(360) 407-6307	6/2/2016
	Paula Ehlers	(360) 407-0271	6/2/2016
	Diane Butorac	(360) 407-6594	6/16/2016
	Loree Randall	(360) 407-6068	7/12/2016
	Garin Schrieve-	(360) 407-6868	6/9/2016
Southwest Clean Air Agency	Wess Safford	(360) 574-3058	5/4/2016
Cowlitz County Building and Planning	Elaine Placido	(360) 577-3052 x6662	6/9/2016
Consolidated Diking Improvement District (CDID)	Ken Cachelin	(360) 423-2493	5/19/2016
9b. Are any of the wetlands or waterbodies identified in Part 7 or Part 8 of this JARPA on the Washington Department of Ecology's 303(d) List? [help] <ul style="list-style-type: none"> • If Yes, list the parameter(s) below. • If you don't know, use Washington Department of Ecology's Water Quality Assessment tools at: http://www.ecy.wa.gov/programs/wq/303d/. 			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Segments of the Columbia River are on Ecology's 303(d) list and are located approximately 2.9 miles upstream (bacteria) and 4.9 miles downstream (temperature) of the dock location.			

9c. What U.S. Geological Survey Hydrological Unit Code (HUC) is the project in? [help]

- Go to <http://cfpub.epa.gov/surf/locate/index.cfm> to help identify the HUC.

Lower Columbia-Clatskanie Watershed HUC 17080003

9d. What Water Resource Inventory Area Number (WRIA #) is the project in? [help]

- Go to <http://www.ecy.wa.gov/services/gis/maps/wria/wria.htm> to find the WRIA #.

WRIA #25

9e. Will the in-water construction work comply with the State of Washington water quality standards for turbidity? [help]

- Go to <http://www.ecy.wa.gov/programs/wq/swqs/criteria.html> for the standards.

Yes No Not applicable

9f. If the project is within the jurisdiction of the Shoreline Management Act, what is the local shoreline environment designation? [help]

- If you don't know, contact the local planning department.
- For more information, go to: http://www.ecy.wa.gov/programs/sea/sma/laws_rules/173-26/211_designations.html.

Rural Urban Natural Aquatic Conservancy Other _____

9g. What is the Washington Department of Natural Resources Water Type? [help]

- Go to <http://www.dnr.wa.gov/forest-practices-water-typing> for the Forest Practices Water Typing System.

Shoreline Fish Non-Fish Perennial Non-Fish Seasonal

9h. Will this project be designed to meet the Washington Department of Ecology's most current stormwater manual? [help]

- If No, provide the name of the manual your project is designed to meet.

Yes No

Name of manual: Cowlitz County Stormwater Drainage Manual 2011

9i. Does the project site have known contaminated sediment? [help] If Yes, please describe below.

Yes No

There is an isolated area of contaminated sediment on the Property but outside of the proposed dredge area that is described below.

Sediment sampling was conducted prior to 2011 maintenance dredging at Dock 1, immediately upstream of the proposed dredge area. Results of sediment analysis concluded that all of the material to be dredged was suitable for in-water disposal at flow lane locations within the Columbia River. All material dredged under that authorization was disposed of at the authorized flow lane disposal site, which was located between river mile (RM) 60 and 61.

Additional sampling was conducted in nearshore and offshore areas of the Property (all landward of the berth face and outside of the dredge program area) in 2012 in support of the Remedial Investigation/Feasibility Study (RI/FS) process for the former Reynolds Metals Reduction Plant. The investigation discovered no exceedance of sediment-management standards at any nearshore or offshore location, except for in a localized area immediately adjacent to Outfall 002A at test station SS-09 (just downstream from the Dock 1 trestle). Concentrations of chemicals (PCBs and cPAH compounds) in sediment at station SS-09 exceeded testing criteria but did not exceed criteria for human health protection. The distribution of contamination was limited in area and depth to an isolated layer six inches in thickness, and the contamination source was identified as a historical discharge and not the result of an ongoing release. Trend analysis further indicated that sediment

quality in this area has been recovering over time. Consistent with direction provided by Ecology, the RI/FS process has evaluated the need to remediate this localized area of contamination, and has determined that removal and upland on-site or off-site placement of the contaminated sediments was the most appropriate remedy for this area. That action is currently being planned in coordination with Ecology.

9j. If you know what the property was used for in the past, describe below. [\[help\]](#)

The Applicant's leased area has been in industrial use since 1941. Reynolds Metals Company constructed and operated an aluminum smelter and aluminum casting facility within the project area from 1941 until 2000. Northwest Alloys purchased the Property in May 2000 and remains the owner, and the Applicant now operates the existing facility on a ground lease with NWA. The Reynolds Metals Company facility was an intensive industrial use and, at the time of its closure in 2001, it employed approximately 800 workers and operated 24 hours per day, seven days per week. In December 2004, Chinook Ventures purchased the facility assets, obtained a ground lease, and operated a bulk product terminal to store and transport fly ash, petroleum coke, alumina, and cement from 2004 to 2010. The Applicant purchased the facility assets from Chinook Ventures in January 2011, and now operates on a ground lease with NWA. Today, portions of the project area are used for industrial purposes, but overall the project area is underused, with industrial activities occurring at a much lower intensity than historical levels. The Property continues to support industrial operations and a portion of the Property is currently used as a Bulk Product Terminal that includes both marine and upland facilities. Current import and export activities are conducted by ship, railroad, and truck. The coal export terminal would be located on approximately 190 acres (Project Site) of the Property in a geographically distinct area, separate and apart from the Bulk Product Terminal.

9k. Has a cultural resource (archaeological) survey been performed on the project area? [\[help\]](#)

- If Yes, attach it to your JARPA package.

Yes No

A cultural resources analysis for this Property has been prepared and was submitted to the USACE on October 29, 2015. (*Millennium Coal Export Terminal, Longview, Washington, Historical and Cultural Resources Assessment*, October 1, 2015, AECOM).

9I. Name each species listed under the federal Endangered Species Act that occurs in the vicinity of the project area or might be affected by the proposed work. [help]

Table 2. The following species and critical habitats occur in vicinity of the project area or might be affected by the proposed work.

Species, ESU/DPS If applicable	Federal Status	Critical Habitat Designated	Critical Habitat in Vicinity of the Project
Chinook salmon (<i>Oncorhynchus tshawytscha</i>)			
Snake River fall ESU	threatened	yes	yes
Snake River spring/summer ESU	threatened	yes	yes
Upper Columbia River spring ESU	endangered	yes	yes
Lower Columbia River ESU	threatened	yes	yes
Upper Willamette River ESU	threatened	yes	yes
Coho salmon (<i>O. kisutch</i>)			
Lower Columbia River ESU	threatened	yes	yes
Chum salmon (<i>O. keta</i>)			
Columbia River ESU	threatened	yes	yes
Sockeye salmon (<i>O. nerka</i>)			
Snake River ESU	endangered	yes	yes
Steelhead trout (<i>O. mykiss</i>)			
Snake River DPS	threatened	yes	yes
Upper Columbia River DPS	endangered	yes	yes
Middle Columbia River DPS	threatened	yes	yes
Lower Columbia River DPS	threatened	yes	yes
Upper Willamette River DPS	threatened	yes	yes
Bull trout (<i>Salvelinus confluentus</i>)			
Columbia River DPS	threatened	yes	yes
Other species			
Eulachon (<i>Thaelichthys pacificus</i>), southern DPS	threatened	yes	yes
Green sturgeon (<i>Acipenser medirostris</i>), southern DPS	threatened	yes	no
Streaked horned lark (<i>Eremophila alpestris strigata</i>)	threatened	yes	no
Yellow-billed cuckoo (<i>Coccyzus americanus</i>), western DPS	threatened	proposed	no
Columbian white-tailed deer (<i>Odocoileus virginianus leucurus</i>), Columbia DPS	endangered*	no	n/a

*proposed for downlisting to threatened

Please note that species and critical habitat listings for the streaked horned lark were finalized in October 2013, and the western DPS of the yellow-billed cuckoo was listed in October 2014. Despite the developed nature of the Project Site and surrounding areas and lack of suitable habitat, streaked horned larks and yellow-billed cuckoo are included in this table because of the recentness of these listings.

The US Fish and Wildlife Service (USFWS) has jurisdiction over a number of other listed species and critical habitats in Cowlitz County which are not included in Table 2 based on the developed nature of the Project Site and surrounding areas, and lack of suitable habitat. These include marbled murrelet, Northern spotted owl, and Nelson's checker-mallow.

9m. Name each species or habitat on the Washington Department of Fish and Wildlife's Priority Habitats and Species List that might be affected by the proposed work. [help]

In addition to the above-mentioned threatened/endangered species, WDFW spatial information indicates that the following Priority Habitats and Species may be present within the main stem of Columbia River in the general vicinity of the dredge program area and potential flow lane disposal areas:

- Coastal resident/sea run cutthroat trout (*Oncorhynchus clarki clarki*)
- Pink salmon (*Oncorhynchus gorbuscha*)
- White sturgeon (*Acipenser transmontanus*)

Not mapped, but included based on potential distribution

- Pacific lamprey (*Entosphenus tridentata*)
- River lamprey (*Lampetra ayresi*)
- In Stream Habitat

Part 10–SEPA Compliance and Permits

Use the resources and checklist below to identify the permits you are applying for.

- Online Project Questionnaire at <http://apps.oria.wa.gov/opas/>.
- Governor's Office for Regulatory Innovation and Assistance at (800) 917-0043 or help@oria.wa.gov.
- For a list of addresses to send your JARPA to, click on [agency addresses for completed JARPA](#).

10a. Compliance with the State Environmental Policy Act (SEPA). (Check all that apply.) [help]

- For more information about SEPA, go to www.ecy.wa.gov/programs/sea/sepa/e-review.html.

A copy of the SEPA determination or letter of exemption is included with this application. .

On April 16, 2013, Cowlitz County issued a Revised SEPA Determination of Significance and Request for Comments on Scope of EIS for Millennium Bulk Terminals Longview LLC Coal Export Terminal. Cowlitz County Department of Building and Planning and Ecology are co-lead agencies with Cowlitz County designated the nominal lead for environmental review under SEPA. A SEPA Draft EIS was published on April 29, 2016 followed by a 45-day comment period. The comment period closed on June 13, 2016. It is anticipated that a SEPA Final EIS will be issued in late 2016.

A SEPA determination is pending with _____ (lead agency). The expected decision date is _____.

I am applying for a Fish Habitat Enhancement Exemption. (Check the box below in 10b.) [help]

This project is exempt (choose type of exemption below).

Categorical Exemption. Under what section of the SEPA administrative code (WAC) is it exempt?

Other: _____

SEPA is pre-empted by federal law.

10b. Indicate the permits you are applying for. (Check all that apply.) [\[help\]](#)

LOCAL GOVERNMENT

Local Government Shoreline permits:

Substantial Development* Conditional Use* Variance

***Applications were submitted in February 2012 to Cowlitz County.**

Shoreline Exemption Type (explain):

Other City/County permits:

Floodplain Development Permit (if required)* Critical Areas Ordinance (if required)*

***Not applying at this time and will be applied for at a later date as required.**

STATE GOVERNMENT

Washington Department of Fish and Wildlife:

Hydraulic Project Approval (HPA)* Fish Habitat Enhancement Exemption – [Attach Exemption Form](#)

***Not applying for HPA permit at this time and will be applied for at a later date as required.**

You must submit a check for \$150 to Washington Department of Fish and Wildlife, unless your project qualifies for an exemption or alternative payment method below. **Do not send cash.**

Check the appropriate boxes:

\$150 check enclosed. Check # _____
Attach check made payable to Washington Department of Fish and Wildlife.

My project is exempt from the application fee. (Check appropriate exemption) _____

HPA processing is conducted by applicant-funded WDFW staff.
Agreement # _____

Mineral prospecting and mining.

Project occurs on farm and agricultural land.

(Attach a copy of current land use classification recorded with the county auditor, or other proof of current land use.)

Project is a modification of an existing HPA originally applied for, prior to July 10, 2012.
HPA # _____

Washington Department of Natural Resources:

Aquatic Use Authorization*

Complete [JARPA Attachment E](#) and submit a check for \$25 payable to the Washington Department of Natural Resources.

Do not send cash. *Not applying for Aquatic Use Authorization at this time and will be applied for at a later date as required.

Washington Department of Ecology:

Section 401 Water Quality Certification

FEDERAL GOVERNMENT

United States Department of the Army permits (U.S. Army Corps of Engineers):

Section 404 (discharges into waters of the U.S.)

Section 10 (work in navigable waters)

United States Coast Guard permits:

Private Aids to Navigation (for non-bridge projects)

Part 11—Authorizing Signatures

Signatures are required before submitting the JARPA package. The JARPA package includes the JARPA form, project plans, photos, etc. [\[help\]](#)

11a. Applicant Signature (required) [\[help\]](#)

I certify that to the best of my knowledge and belief, the information provided in this application is true, complete, and accurate. I also certify that I have the authority to carry out the proposed activities, and I agree to start work only after I have received all necessary permits.

I hereby authorize the agent named in Part 3 of this application to act on my behalf in matters related to this application. KJ (initial)

By initialing here, I state that I have the authority to grant access to the property. I also give my consent to the permitting agencies entering the property where the project is located to inspect the project site or any work related to the project. KJ (initial)

Kristin K. Gaines Applicant Printed Name  Applicant Signature 7/13/2016 Date

11b. Authorized Agent Signature [\[help\]](#)

I certify that to the best of my knowledge and belief, the information provided in this application is true, complete, and accurate. I also certify that I have the authority to carry out the proposed activities and I agree to start work only after all necessary permits have been issued.

Glenn B. Grette Authorized Agent Printed Name  Authorized Agent Signature 7/13/2016 Date

11c. Property Owner Signature (if not applicant) [\[help\]](#)

Not required if project is on existing rights-of-way or easements.

I consent to the permitting agencies entering the property where the project is located to inspect the project site or any work. These inspections shall occur at reasonable times and, if practical, with prior notice to the landowner.

Mark A. Stiffler Property Owner Printed Name  Property Owner Signature 7/13/2016 Date

18 U.S.C §1001 provides that: Whoever, in any manner within the jurisdiction of any department or agency of the United States knowingly falsifies, conceals, or covers up by any trick, scheme, or device a material fact or makes any false, fictitious, or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious, or fraudulent statement or entry, shall be fined not more than \$10,000 or imprisoned not more than 5 years or both.

If you require this document in another format, contact the Governor's Office for Regulatory Innovation and Assistance (ORIA) at (800) 917-0043. People with hearing loss can call 711 for Washington Relay Service. People with a speech disability can call (877) 833-6341. ORIA publication number: ENV-019-09 rev. 09/2015