

COLUMBIA RIVERKEEPER 111 Third Street Hood River, OR 97031 _{phone} 541.387.3030 www.columbiariverkeeper.org

June 13, 2014

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Sent via email

RE: Additional information showing that rebuilding the Port Westward dock would enable the Morrow Pacific coal export project and crude oil shipping, and increase Panamax vessel traffic in the Columbia River Estuary.

Dear U.S Army Corps of Engineers, Portland District:

Columbia Riverkeeper (Riverkeeper) is sending this letter to the U.S. Army Corps of Engineers (Corps) to supplement the information provided in Riverkeeper's letter to the Corps dated April 25, 2014, regarding the need for an Environmental Impact Statement (EIS) for proposed modifications to the Beaver Army Terminal Dock at Port Westward. Riverkeeper expressly requests that the Corps place copies of this letter and the enclosed documents in the Corps' files on Ambre Energy's proposed Morrow Pacific Project (NWP 2012-056), the Port of St. Helens' application to rebuild the lower section of the dock (NWP 2013-427), and Global Partners LP's dock expansion application (NWP 2007-998).

The two enclosed documents are grant applications and supporting documents submitted by the Port of St. Helens—the owner of the Port Westward dock—to the Oregon Department of Transportation. The grant applications request four million dollars of public funds to reconstruct the upstream and downstream portions of the Port Westward dock to accommodate Panamax vessels loading coal and oil.

Specifically, the Port of St. Helens' grant application No. 1M0294 clearly and expressly states that the planned reconstruction of the downstream portion of the dock is necessary for, and intended to facilitate, the Morrow Pacific coal export project. The Port of St. Helens' grant application claims that the money is "urgently needed to . . . meet the requirements of [Ambre Energy]'s Morrow Pacific Project," and would be spent on re-building a dock where Ambre Energy "will transload coal from barge to Panamax vessels." According to Ambre Energy, the dock reconstruction is "essential to our plans" to export coal through the Columbia River.

The link between the proposed dock renovations and coal and crude oil shipping, and increased Panamax vessel traffic, in the Columbia River Estuary is clear. Because these activities, which would result from the dock renovations, may have significant environmental effects, the Corps must prepare an EIS on the proposed dock expansions.

Sincerely,

Miles Johnson Clean Water Attorney Columbia Riverkeeper (541) 272 – 0027 <u>miles@columbiariverkeeper.org</u>

enclosures:

- Port of St. Helens, *ConnectOregon Application No. 1M0352 (Berth 1 Beaver Dock)*
- Port of St. Helens, ConnectOregon Application No. 1M0294 (Berth 2 Beaver Dock)

cc:

Audi Huber, Confederated Tribes of the Umatilla Indian Reservation Carl Merkle, Confederated Tribes of the Umatilla Indian Reservation Mischa Connine, NOAA Fisheries Service Jan Hasselman, EarthJustice Chris Winter, Crag Law Center Marla Nelson, Northwest Environmental Defense Center Devorah Ancel, Sierra Club Tanya Sanerib, Center For Biological Diversity