



**PORT GAMBLE S'KLALLAM TRIBE  
NATURAL RESOURCES DEPARTMENT**

31912 Little Boston Rd. NE – Kingston, WA 98346

July 27, 2017

Loree' Randall, Project Manager  
Washington State Department of Ecology  
300 Desmond Drive  
Lacey, WA 98503  
(360) 407-6068

**Subject:** Millenium Bulk Terminal 401 Water Quality Certification

Dear Ms. Randall,

Thank you for the opportunity to comment on 401 Water Quality Certification for Millenium Bulk Terminal in Longview. I am submitting the following comments on behalf of the Port Gamble S'Klallam Tribe's Natural Resources Department. The Port Gamble S'Klallam Tribe is the successor in interest to Indian bands and tribes signatory to the 1855 Treaty of Point No Point, 12 Stat. 933.<sup>1</sup> The proposed project is located along the Columbia River which supports regionally important fisheries that are threatened by the increased risk of spills from rail and barge traffic associated with this project, and the resulting degradation of water quality. Research has shown that Columbia River and Puget Sound salmon stocks comingle offshore, and that the reduced abundance of one stock may result in increased predation pressure on and depletion of another. Therefore, impacts to Columbia River salmon stocks can impact the Tribe's treaty rights. In addition, the increase in greenhouse gas emissions that is likely to occur as a result of this project would have a severe impact on freshwater and marine ecosystems which support treaty-protected fisheries, due to degraded water quality from warmer temperatures and changing ocean chemistry. Due to the potentially significant adverse effects that this project would have on the Tribe's fisheries, we oppose the water quality certification for this project. The 401 water quality certification should be denied without prejudice.

Please feel free to contact me at 360-297-6289, [sphillips@pgst.nsn.us](mailto:sphillips@pgst.nsn.us)

Sincerely,

Sam Phillips  
Environmental Scientist  
Port Gamble S'Klallam Tribe

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<sup>1</sup> *United States v. Washington*, 459 F. Supp. 1020, 1039 (W.D. Wash. 1978).