Diana Gordon

I don't know if I commented the first time about the 401 Certification, but my concern about this project has only grown since this process began. A troubling aspect of this project is the impact this terminal will have on water quality and some designated uses of the Columbia River.

Water quality is imperative to the Pacific Northwest and construction of a huge dock will place it at risk. Although the dock has been reduced in size somewhat, the FEIS found that the project would have an adverse impact on the physical or behavioral responses of fish. The use of the Columbia River for salmon spawning, rearing, and harvesting - all protected designated uses - is vitally important to tribal members as well as ordinary citizens. The FEIS makes clear that the project would adversely affect all of these uses in ways that cannot be mitigated.

Further degradation will occur during construction of the dock from the runoff of the rain. This stretch of the Columbia already suffers from urban pollution and construction runoff will contribute to that. Dredging for the proposed dock will cause increased turbidity. Dredging also results in the destruction of habitat for benthic macro invertebrates, a primary food source for juvenile salmon.

A further water quality problem arises when, during construction, some old timber piles must be removed from the site. This old timber was treated many years ago with toxic chemicals, i.e., creosote, which will unfortunately join the increased sediment already suspended in the river water from other sources. Hopefully, this would be a temporary condition; however, some creosote could remain in the vicinity long term.

I am especially concerned about monitoring this situation. Frequent and thorough monitoring is vitally important given the immense scope of this proposal. It should not be done by Millennium, but by an independent monitor.

These are only a few of the problems that will occur during the construction of this coal terminal's dock. This 401 Water Quality Certification should be denied.