

November 28, 2016

Millennium Bulk Terminals NEPA EIS
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

RE: Millennium Bulk Terminals draft Environmental Impact Statement

To Whom It May Concern:

On behalf of the Association of Washington Business (AWB), I am writing to express our support of the proposed Millennium Bulk Terminals (MBT-Longview) project.

AWB is the state's oldest and largest statewide business association, which includes nearly 8,000 employers representing 700,000 employees. AWB serves as both the state's chamber of commerce and the manufacturing and technology association.

We are pleased to see the release of the draft Environmental Impact Statement (DEIS) for the MBT-Longview proposal, and are appreciative of the work put forward by the US Army Corps of Engineers.

As you are aware, Washington is one of the most trade-dependent states in the nation. The MBT-Longview project, as with other projects of statewide significance, represents growth opportunities that will boost and enhance the state's trade capacity. In order for the state to remain competitive in a global economy, we need a fair and timely review of all projects to ensure and protect our competitive opportunities.

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The MBT-Longview project will provide family-wage jobs in a part of the state that needs them-more than 2,600 direct and indirect jobs during construction, and 300 permanent direct and indirect jobs-delivering economic stimulus for the region and the state. Many of these jobs are blue collar positions, which are unfortunately becoming rarer. The project will also generate additional tax revenue, more than \$37 million to the state and \$5 million to the county during construction, and ongoing operations that generate nearly \$6 million in tax collections for the state, local governments, and special purpose districts annually.

Local communities are already reaping the benefit of the partnership developed by MBT-Longview and former property owners, who are providing oversight on the ongoing clean-up of the former Reynolds Longview site. While the clean-up of the site is a separate project than that considered under the DEIS, it shows the commitment and environmental stewardship one can expect from MBT-Longview.

While we appreciate the rigorous review conducted by the US Army Corps of Engineers, and the release of the DEIS, we are concerned with the length of time and costs associated with such a review thus far. At more than four years in length, and nearly double the time of other significant project reviews, it is time to finish this review. The employer community needs the assurance of regulatory certainty. We strongly support a rigorous and thorough review of all projects, as well as compliance with environmental laws. When the review becomes a significant delay, however, the project proponent and beneficiaries of the project are unnecessarily harmed.

Several of the DEIS' major findings show there will be no significant environmental impacts to the proposed site, or state, as a result of this project. In fact, the DEIS echoes many of the findings of a similar review conducted under Washington state's State Environmental Policy Act (SEPA). The DEIS debunks many of the serious claims of environmental impact, showing the proposal will have no adverse impacts to the natural environment. These include issues related to coal dust, rail and vehicle traffic, rail and vehicle traffic, among others.

One key difference between the DEIS and a similar review completed under SEPA is the manner each study addresses greenhouse gas emissions. AWB applauds the US

Army Corps of Engineers' decision not to diverge from the agency's long-standing policies for analyzing greenhouse gas emissions. Attempting to compute emissions from the transport and use of a commodity or product half way around the world is unreasonable and inappropriate. The DEIS rejects this speculative exercise and focuses on impacts likely to occur at and near the proposed project. This analysis is similar to the review conducted on numerous other projects in Washington State generally, and along the Columbia River specifically. AWB believes this was the correct decision.

As Washington state continues to recover from a slowed economy, we deserve and require a timely review of all projects. Instead of imposing new and unprecedented regulations on the employer community, our leaders should be encouraging responsible growth. We need a diverse economy in which everyone-in every corner of the state-has the opportunity to prosper.

A handwritten signature in black ink, appearing to read "Brandon Houskeeper". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brandon Houskeeper
Government Affairs Director-Environmental Policy