



KATIE SWEENEY
General Counsel

November 28, 2016

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

RE: Comments on Millennium Bulk Terminals NEPA draft EIS

To Whom It May Concern:

The National Mining Association (NMA) appreciates the opportunity to submit comments on the U.S. Army Corps of Engineers' draft environmental impact statement (DEIS) for the Millennium Bulk Terminals proposal to construct a coal export facility in Longview, Wash. NMA is a national trade association that includes the producers of most of the nation's coal, metals, industrial and agricultural minerals; the manufacturers of mining and mineral processing machinery, equipment and supplies; and the engineering and consulting firms, financial institutions and other firms serving the mining industry. Most NMA members rely on rail or ports to move their products and thus are interested in ensuring adequate infrastructure and capacity for such transport.

Millennium Bulk Terminals (Millennium) is a critically important export facility ideally located to provide maximum trading potential with U.S. allies in the Asia-Pacific region. As such, NMA strongly supports Millennium's permitting proposal and believes it will provide for the further cleanup and remediation of a 1940's era industrial site into a thriving port facility that positively impacts thousands of direct and indirect jobs while creating economic opportunities and benefits for the surrounding community.

In 2013, NMA took the opportunity to comment on the scope of the EIS planned for Millennium's proposed project and urged the Corps to follow its well-established regulations and policy in determining the scope of the EIS. This was intended to ensure that the Corps recognized that the National Environmental Policy Act (NEPA) is not boundless, that potentially related downstream and upstream actions not within the agency's control should be excluded and that the EIS should consider the social and economic benefits of coal exports.

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After reviewing the Corps' DEIS for Millennium, NMA applauds the thorough and complete review of the project. The analysis addresses all issues that have normally been reviewed in environmental impact statements for similar projects. Furthermore, NMA appreciates the Corps' appropriate exclusion of speculative global greenhouse gas evaluation which is consistent with longstanding agency policy and the law.

Moving forward, NMA urges the Corps to complete its work judiciously and continue to provide Millennium with a fair and impartial review of the project's merits.

Sincerely,

A handwritten signature in black ink that reads "Katie Sweeney". The signature is written in a cursive, flowing style.

Katie Sweeney