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Vice President

Energy & Resources Policy

November 29, 2016

Colonel John G. Buck
U.S. Army Corps of Engineers
Post Office Box 3755
Seattle, WA 98124-3755

MBTL NEPA Draft EIS
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

Re: Millennium Bulk Terminals-Longview NEPA Draft Environmental Impact Statement.

The National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, submits the following comments to the U.S. Army Corps of Engineers (Corps) on the Draft Environmental Impact Statement (DEIS) prepared under the National Environmental Policy Act (NEPA) for the Millennium Bulk Terminals – Longview (MBTL) coal export terminal. The DEIS correctly finds that MBTL will be beneficial to the local and regional economy and can be constructed and operated without significant impacts to the environment.

MBTL is reinvesting in an underutilized 416-acre site, upgrading what was a 1940s-era aluminum smelter, and removing and recycling over 300,000 tons of waste from the site. The proposed redevelopment of this facility would create a coal receiving, storage and shipping terminal bringing a private investment of over \$680 million dollars into the area. MBTL will generate millions of dollars in economic output in Washington and the Pacific Northwest, creating 2,650 direct and indirect jobs in the region during its construction phase and over 300 long-term jobs in the community.

Export projects like MBTL are vital to the success of domestic manufacturing and job creation. Currently, 95 percent of the world's consumers live outside the borders of the United States. To grow jobs domestically and improve our country's competitiveness, manufacturers must modernize our export infrastructure to stay competitive in an increasingly tough global economy. Exports constitute 20 percent of U.S. manufacturing production, and have increased at a rapid rate in recent years. In fact, U.S. manufactured goods exports more than quadrupled since 1990, growing twice as fast as U.S. GDP since 2002. Unfortunately, the United States is still falling behind. U.S.-manufactured goods exports fell 6.1 percent in 2015 – a trend that has continued so far in 2016. Indeed, the U.S. exports far less of its manufacturing output than the global average. Expanding ports and related infrastructure will allow manufacturers to meet global demands for our products while growing our economy and creating jobs. Especially in a region like the Pacific Northwest where one in four jobs is related to trade, MBTL is the kind of export infrastructure project that will help increase family-wage jobs for the local community.

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The DEIS concludes a comprehensive, and largely positive, review of MBTL under NEPA. The DEIS finds that MBTL would be compatible with surrounding land uses and would not impact nearby recreational or agricultural land uses. It would generate beneficial economic impacts in terms of jobs, wages, and economic output. It would not add new demands to public sewer and wastewater facilities, or place substantial new demands on the local water supply. It would have little to no visual impacts. It would not affect tribal fishing, which generally occurs outside the study area and upstream of the project. Its energy demand would be minor and could be met by existing local and regional supply. Impacts on surface water and floodplains would be low and water would not need to be withdrawn from the Columbia River or other surface waters to meet the project's water demands. Construction and operation would not affect groundwater quality. Fish are unlikely to be affected by project-related vessel traffic. Increased vessel traffic could be handled by existing infrastructure and vessel management systems. There would be no adverse vibration impacts from construction or operation. Coal dust deposition would be a fraction of the 2.0 grams per square meter benchmark used for the DEIS.

The environmental issues raised by the DEIS can be easily mitigated using best management practices—including all concerns relating to coal dust or coal deposition, which the DEIS found are easily controllable.

As manufacturers we rely on terminals like MBTL to export our goods, products and raw materials to customers around the world. United States coal exports are supported by jobs in the manufacturing industry. These jobs include mining and support activities for coal mining; construction; railroad transportation; transport by water and truck; port operations and cargo handling; and all the manufacturing supply chain jobs that support these activities. Manufacturers support investments in private infrastructure projects that improve the nation's transportation and export capacity while also meeting established environmental standards. Through a thorough NEPA process, MBTL has shown that the project will be able to promote economic gains for the community and industry, create jobs, and maintain environmental harmony. Manufacturers appreciate the opportunity to comment in support of MBTL and urge the Corps to issue a final Environmental Impact Statement and Record of Decision as quickly as possible.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ross Eisenberg", is centered on a light blue rectangular background.

Ross Eisenberg
Vice President
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