



Washington Legislative Office

Transportation Division

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President

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National Legislative Director

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

November 29, 2016

Please accept these comments on behalf of the Transportation Division of the International Association of Sheet Metal, Air, Rail and Transportation Workers (SMART TD). SMART TD is the largest railroad operating union in North America and we represent employees on every Class I and Class II railroad, as well as employees on many regional and shortline railroads. We serve as the voice for over 125,000 active and retired workers, drawn predominantly from the operating crafts in the railroad industry, including conductors, brakemen, switchmen, ground service personnel, locomotive engineers, hostlers, and workers in associated crafts.

Nearly one in five railroad jobs in America is directly linked to hauling coal, and consequently many SMART TD members have been adversely affected as coal shipments have dropped dramatically. Overall coal shipments are down 30% this year compared to last year, and we currently have around 10,000 members on furlough.

SMART TD members have been operating trains that safely carry coal through the state of Washington for decades. Prior to the announcement of the recent proposals to construct new coal export terminals – and significantly bolster railroad jobs – there has never been major objections or concerns about the health or safety of moving coal in Washington or any other state. Safety has been a key focus of our union for more than 100 years and handling coal has never been a significant safety concern for our members.

The release of the draft environmental impact statement (DEIS) for Millennium Bulk Terminals marks a significant step toward construction of a project that would help preserve critical railroad jobs and create good paying union jobs in construction and at the port itself.

Unfortunately I fear that regulatory agencies forget about the workers lives that are impacted when projects such as this have a long and arduous permitting process. Every extra day spent on agency paperwork is one more day that a skilled tradesperson goes home without a paycheck to support their family.

This is a transloading facility, no different than many others that exist across this nation. This project is simply the addition of two new docks in to the Columbia River and the building of what is essentially a rail terminal on an existing heavy industrial site. It is

ridiculous that this permitting process will end up taking 5 years and \$15 million to complete. Our nation's trade infrastructure is essential to the movement of goods in this country, and private port projects on a brownfield site such as this should not require a 3,500 page environmental impact statement and years of study.

SMART TD members are dedicated to the protection of the environment, but certainly this level of scrutiny, time, and financial commitment to permit ANYTHING on a site that has been used for heavy industry for 75 years is absurd.

On behalf of the SMART TD, I respectfully request that you finalize the Environmental Impact Statement by April 30, 2017 and issue a favorable Record of Decision by July 2017 to correspond with the schedule for the state and county permitting timeline. Our country needs this critical trade infrastructure and our members need these family wage jobs today. Please be mindful of the impact your timeframe has on the lives of the workers that have built this country and ensure that its trade moves safely.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read "John Risch". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Risch
National Legislative Director
SMART- Transportation Division

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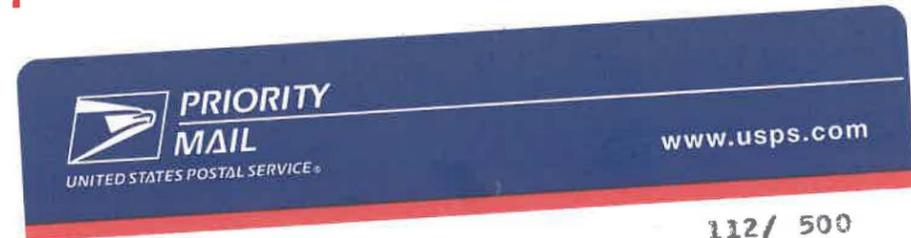
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From
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