



**Industrial Energy Consumers of America**  
*The Voice of the Industrial Energy Consumers*

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June 10, 2016

Millennium Bulk Terminals EIS  
c/o ICF International  
710 Second Ave, Suite 550  
Seattle, WA 98104 4

***Re: Millennium Bulk Terminals-Longview SEPA Draft Environmental Impact Statement***

On behalf of the Industrial Energy Consumers of America (IECA) and our Washington State member companies, we are writing to express deep concern regarding actions by the Washington Department of Ecology and Cowlitz County to recommend or require the Millenium Bulk Terminal, to be accountable for not only the local environmental impacts of the port expansion, but also the global environmental footprint of the cargo. We are very concerned that this could set a precedent for all other product exports

IECA is a nonpartisan association of leading manufacturing companies with \$1.0 trillion in annual sales, over 2,900 facilities nationwide, and with more than 1.6 million employees worldwide. IECA membership represents a diverse set of industries including: chemical, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, building products, automotive, brewing, independent oil refining, and cement.

The potential precedent of requiring the exported product to account for the environmental footprint will significantly and negatively impact the exports of manufacturing products. U.S. manufacturers already have a significant time competing with foreign competitors. According to the Bureau of Economic Analysis (BEA), in 2016, the manufacturing trade deficit stands at \$627 billion. All manufacturing products include an environmental footprint.

IECA urges the agencies to issue final permits for this project and importantly, remove language related to the mitigation of emissions from goods being shipped through the terminal.

Sincerely,

Paul N. Cicio  
President