



SMART-TRANSPORTATION DIVISION

BEFORE THE

Cowlitz County and Washington State Department of Ecology

Millennium Bulk Terminals-Longview
SEPA Draft Environmental Impact Statement

June 10, 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. However, the proposed mitigation requirements for greenhouse gas emissions contained in the DEIS would likely kill this project.

We are unaware of any other permitting process that has attempted to impose a mitigation requirement on a facility based on the greenhouse gas emissions generated from the movement of a commodity, or the use of the finished product once shipped. Nor has any manufacturer or transloader been required to mitigate for the end use of the product in another country.

This unworkable requirement will set a terrible precedent that that could affect future exports if retained in the final EIS for Millennium. For example, if this mitigation requirement is applied to exporting Boeing aircraft, which produce tremendous amounts of CO₂ emissions, it would force Boeing to shut down their Washington operations and build their aircraft elsewhere. It would also adversely affect exports of scrap steel headed to smelters, or agricultural commodities that are grown in a less than stellar manner. The list is endless and really would call Washington's role in future shipping into question.

We believe that a decision by the state of Washington to impose a greenhouse gas mitigation requirement for the movement of goods by rail will have a chilling effect on the development of new projects in the state. This new requirement runs the risk of imposing high additional costs on any products moved through the state by rail, and will discourage needed investment in ports and other projects. This will only serve to jeopardize the jobs that would be created directly and indirectly by these projects.

For the record, we believe in global climate change. That being said, America and the rest of the world will be burning a lot of coal for decades. Since that is the case it makes sense for the health of our planet to burn high quality, low sulfur, low mercury coal that is mined properly with strict reclamation standards, such as Powder River basin coal. If this project is not approved, or if it is approved with this onerous provision, it is likely that poor quality, higher sulfur and mercury coal will be burned in its place and America will lose out on creating some desperately needed good paying jobs.

On behalf of the SMART TD, we respectfully request that you eliminate the proposed mitigation requirements for greenhouse gas emissions contained in the DEIS. It is a troubling precedent that will impose high costs and likely kill this project and future projects that depend on rail transportation.

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