



Our membership and services span the globe

10 N Post St Ste 305 | Spokane WA 99201-0705

Phone: 509.624.1158 | Fax: 509.623.1241
E-mail: nwma_info@nwma.org | Web: www.nwma.org

October 15, 2013

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

To whom it may concern.

The Northwest Mining Association (NWMA) appreciates the opportunity to comment on the Millennium Bulk Terminals EIS. We strongly oppose the EIS as written and ask for an EIS with a local, limited scope that focuses on the environmental issues that are immediate and directly impacted by the terminal itself.

We ask the lead agencies involved in the scoping process to conduct a locally focused study. It's unrealistic and unprecedented to conduct a full EIS scoping that studies the harvesting, development or manufacturing of a product or commodity to and including the end use of the product or commodity. As with the Washington wheat export terminals, as an example, the Department of Ecology did not require the study of nationwide rail impacts, or the end usage of the wheat at its destination. To incorporate any more than the immediate and localized environmental impacts go far beyond the intention and the state EIS regulations.

Yet, trade depends on permitting approval to construct this infrastructure. If the federal, state, or local government applies different permitting standards to projects exporting one product as opposed to others, they are creating a dangerous precedent that will make it hard to build new infrastructure needed to export other goods, like other mined materials, wheat, or manufactured products. It is not the proper role of government to pick winners and losers, to manipulate trade, or the jobs that depend on it by demanding new studies of the overseas use of a product being exported or existing rail lines to bring the product to a port.

The Millennium Terminals present an environmentally responsible opportunity to grow the economy of Washington State. At a time when positive economic activity is desperately needed, the Terminals presents a unique opportunity to provide jobs and growth that few others have at this time.

Thank you for accepting NWMA's comments and we look forward to the federal agencies taking this opportunity to redevelop a better, more appropriate locally focused EIS.

Who We Are

Northwest Mining Association (NWMA) is a 2,400 member national trade association representing the mining industry with members residing in 42 U.S. states, seven Canadian provinces or territories, and ten other countries. NWMA represents the entire mining life cycle, from exploration to reclamation and closure, and is the national voice for exploration, the junior mining sector, and maintaining access to public lands. Our membership includes every facet of the mining industry including geology, exploration, mining, engineering, equipment manufacturing, technical services, and sales of equipment and supplies. Our broad-based membership includes many small miners and exploration geologists as well as junior and large mining companies. More than 80% of our members are small businesses or work for small businesses. Most of our members are individual citizens.

Sincerely,

A handwritten signature in black ink that reads "Laura Skaer". The signature is fluid and cursive, with the first name "Laura" being more prominent than the last name "Skaer".

Laura Skaer
Executive Director

LES/mge