



Brotherhood of Locomotive Engineers and Trainmen

A Division of the Rail Conference — International Brotherhood of Teamsters

Washington State Legislative Board

Workplace Safety, Health, and Education

Shahraim Allen, Chairman

November 13, 2013

U.S. Army Corps of Engineers

Washington State Department of Ecology

Cowlitz County

RE: Millennium Bulk Terminals Project Scoping

To Whom It May Concern:

The Brotherhood of Locomotive Engineers & Trainmen, Washington State Legislative Board submits these comments on behalf of our over 700 Locomotive Engineer members living and working in Washington State. Please allow the record to reflect we fully support the Millennium Bulk Terminals project proposed for Longview, Washington and ask the project not be delayed by unprecedented programmatic scoping at either the state or federal levels.

The Washington State Legislative Board is mindful of established NEPA/SEPA procedures with regard to construction projects in the USA and in Washington State. As a conservation group, we believe a thorough and complete environmental review of the Millennium project is appropriate. However, we do not believe, nor do we support, special interest tactics designed purposely to distort the truth, create hysteria, and unnecessarily delay for years a responsible construction project. The existing NEPA/SEPA processes are arguably the most comprehensive and thorough on earth. Further expansion of the SEPA scope by the state Department of Ecology is unwarranted, unnecessary, and undermines a fair, objective evaluation process.

We believe well established procedures under the NEPA, SEPA, and State Wetlands Act ensure construction projects, like Millennium, are properly vetted for potential, site-specific environmental impacts. This is the proper and responsible course. However, we do not believe it responsible, nor was it ever intended, for either the NEPA or SEPA processes to attempt linking specific commodities, trains, or export terminal facilities to international



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issues such as greenhouse gas emissions, global climate change, or ocean acidification.

We respectfully request the state Department of Ecology and the U.S. Army Corps of Engineers avoid unprecedented, potentially disastrous programmatic EIS scoping of the Millennium Bulk Terminals project.

The Millennium project is unique in that it allows for both a clean-up and renovation of a former industrial site. In place of the old Reynolds Aluminum site, a new, state-of-the-art bulk commodities export terminal will rise capable of serving the international import and export markets for decades to come. The Millennium project will not only create temporary family-wage jobs in the construction trades, but will create permanent, full-time union jobs in waterfront, maritime, and railroad crafts as well. Family-wage, blue-collar jobs are sorely needed in a country where academia has failed miserably in filling the void created by the mass exodus of industry-related jobs outsourced to Asia over the past forty years.

Railroad, waterfront, maritime and construction trade jobs are some of the few remaining blue-collar, middle class jobs capable of providing family-wages and benefits. Raising the state environmental scoping bar to unprecedented levels to appease the mega-funded global climate change lobby is grossly unfair to local job opportunities, small business opportunities, and overall state-level economic development.

Washington State families and small businesses need opportunities and they need them now. Please keep the NEPA/SEPA scoping criteria "site specific" and avoid setting a disastrous precedence for future construction projects in Washington State. Thank you.

Sincerely,

Mike Elliott, Spokesperson
BLET-WSLB