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UNITED TRANSPORTATION UNION SMART TRANSPORTATION DIVISION

International Association of Sheet Metal, Air, Rail and Transportation Workers

Washington State Legislative Board

Representing Railroad Train & Bus Service Employees of Washington State

11225 Roosevelt Way N.E., Seattle, WA. 98125

Washington State Legislative Board Executive Committee:

Herb Krohn – Wash. State Legislative Director – 206-713-5442 – email: hskrohn55@hotmail.com

Steve Mazulo – Assistant Legislative Director

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Millennium Bulk Terminals EIS
C/O ICF INTERNATIONAL
710 Second Avenue, Suite # 550,
Seattle, WA. 98104

As the Washington State Legislative Director for the United Transportation Union/SMART union Transportation Division, representing approximately two thousand members in Washington State, I urge the State Department of Ecology, U.S. Army Corps of Engineers, and Cowlitz County conduct a timely, comprehensive environmental review of the Millennium bulk commodity export facilities project following long established standard practices.

Washington State is proudly home to some of the country's strictest environmental reviews that have protected our environment while allowing our sound economic projects to be constructed. The Millennium Bulk Terminals project should be subjected to the same, standard, environmental review process without an unprecedented programmatic study.

A proposed two-year global programmatic review of a similar project by Washington State Department of Ecology is detrimental to the future of industry investment in our state and region. Programmatic studies, associated with specific commodities, are unprecedented and unreasonable action that takes our state, region, and country down a slippery slope to economic ruin. As an example, if a major airline proposed to expand its air freight facility at SEA-TAC International Airport, would the state attempt to evaluate the content and carbon footprint of the freight commodities being moved through such a facility from point of origin to destination? What about the carbon footprint, exhaust, and high elevation environmental impact to the Ozone layer by jet aircraft used to transport the air freight?

Regarding the Millennium project and the export of coal; if the state ecology embraces this unprecedented and bizarre evaluation scenario, the state is now obligated to conduct a fair evaluation that includes the carbon footprint, transportation exhaust and environmental impact of alternative coal sources that might be obtained from other sources in other countries! You must compare the global environmental impacts associated with those commodity extraction, transportation, and export terminals with the same impacts of this proposal.

This organization, and the railroad and sheet metal workers we represent, urges you to consider the size and scope of your review, and the consequences an unprecedented review

may have on present economic prospects as well as future opportunities in transportation infrastructure and construction.

Today approximately 40 percent of all Washington State jobs are tied to our export economy. As a state and as a region we must continue developing the infrastructure that will allow domestic and foreign trade to thrive here. The Millennium Bulk Terminal project is vital to trade infrastructure associated and will create many hundreds of middle class, family wage jobs for at least the next 40 years or more. Yes, the economics of coal today are making this private investment financially feasible. However, in years to come this facility will be able to import and export other bulk commodities – long after coal ceases to be a major fuel source for electrical generation. These are permanent facilities, creating permanent jobs and providing a much needed tax revenues to local and state governments. If we fail to seize this opportunity here in our own country, other countries are poised to do so.

Beyond global trade, building the Millennium Bulk Terminals project is a reclamation project which cleans up the aftermath of a former industry. There will be hundreds of construction jobs associated with both the clean-up and new construction and many thousands of collateral jobs created not only locally but across the state and region. One estimate indicates \$800 million in wages for Washington State alone.

Along with family-wage jobs for those already working in a union trade craft, the Millennium Bulk Terminal project will help prepare the next generation of union trade craft workers in Washington State. Apprenticeship positions have a long, important tradition in organized labor. The project will provide new opportunities for union apprentices programs to train a future generation in the skilled trades. Together with their co-workers in rail and maritime, they will also be creating a solid economic base for the future of the region. This project is expected to provide more than \$140 million in new tax revenues; revenue sorely needed in a time where the individual middle income taxpayer pays what seems to be more than their fair share.

The global economy doesn't stand still. Areas that don't quickly embrace opportunity find opportunity will quickly pass. If we let unnecessary, unprecedented regulatory roadblocks stop this project, competing exporters in north of our borders are poised to step-in and act where Washington State has not.

That's why the more than 40 member organization of our alliance group strongly supports environmental scoping criteria in keeping with present industry standards. The nearly 250,000 workers the alliance represents in the Pacific Northwest believe more than adequate policies, procedures, and criteria already exist to fairly evaluation the environmental impacts this project might have on the localized environment.

The proposed Millennium Bulk Terminal facility will be a valuable addition to Washington State's international trade infrastructure – and infrastructure programs have always been important to rail labor. The Pacific Northwest grew up along with the railways, arguably the greatest infrastructure project of the 19th century. Railroads brought civilization to the American frontier and were influential in statehood as well.

The railroads remain at the core of our memberships' family livelihoods and economic existence. Due to the fact commodity shipments to and from the Millennium Bulk Terminals project will move by rail, our membership strongly supports this project. Clearly, the benefits reach far beyond rail workers in terms of overall economic scope. However, the prospect for achieving benefit diminishes the longer the Millennium project is delayed. Without any doubt, that is the opposition's tactic. In the interest of our communities, in

keeping with longstanding acceptance of the current environmental scoping processes, we urge the agencies involved in this evaluation to allow the review progress to go forward without unnecessary delay and in keeping with existing scoping precedents.

The necessary and reasonable balance between ecology and economy has been achieved. Now it is time to move forward with the project. If the United States were to halt all coal exports today, we would not prevent other nations who require the commodity from burning even one lump of coal. Even in the brightest of economic forecasts as to the potential of United States coal exports, they would constitute only a very small percentage of world consumption.

Lastly, and most importantly, make no mistake – we are at a crossroads. We can either export American coal, using American infrastructure and American labor, through American ports or we export those jobs, and economic benefits north of our border. We urge you to conduct a thorough, unbiased, comprehensive environmental impact study of the proposed Millennium Bulk Terminals project. However, we believe the scope of the evaluation should and must follow long established scoping protocol and avoid unprecedented, programmatic evaluations. This project should and must be evaluated based on localized merits and impacts only.

On behalf of our board and our membership, we thank you very much for your thoughtful consideration.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'HK', with a stylized flourish extending to the right.

Herb Krohn, Director