

Shahraim Allen

Please see attachment.



July 26, 2017

Department of Ecology—SEA Program
Attn: Federal Project Coordinator
Post Office Box 47600
Olympia, Washington 98504

RE: 401 Water Quality Certification; Millennium Bulk Terminals LLC (MBT-Longview), Coal Export Terminal

Dear Department of Ecology (DOE), Federal Project Coordinator:

Thank you for the opportunity to comment on the 401 Water Quality Certification submission by MBT-Longview. It is our understanding the comment period now open is but a “routine procedural occurrence” due mainly to DOE’s need for additional processing time of the Joint Aquatics Resource Permit Application (JARPA) originally filed in July 2016. Also, it is our understanding there have been no changes in the project proposal which would adversely affect water quality or require any additional study beyond that which has already occurred. However, we are concerned as to what increasingly seems to indicate an agency bias against this project, presumably due to the commodity MBT-Longview intends to transload, i.e., coal.

It is vitally important to interstate and international commerce, infrastructure projects requiring NEPA, SEPA, Wetlands, or any other EIS-type study, receive a fair, unbiased, and timely evaluation. In the case of MBT-Longview, it seems there has been an unprecedented level of scrutiny, especially by DOE, because the commodity they intend to transload is a fossil fuel.

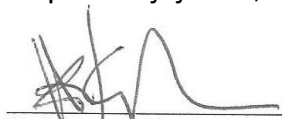
Our unions, as well as many other stakeholders here and in other states, continue to stand **IN SUPPORT** of the MBT-Longview Coal Export Terminal project. Generations of railroaders have hauled coal and every other commodity known to human-kind to various markets for well over a century. MBT-Longview is a critical trans-load seaport portal and would be a significant supply-chain infrastructure upgrade to an industrial corridor that was established more than 70 years ago. Improvements to Washington state’s trade infrastructure are long overdue and lag behind upgrades Canada has completed in half the time. Considering one-in-four jobs here is trade dependent, further delay in supply-chain infrastructure upgrades jeopardize both American jobs and the economic vitality of this region.

In September 2015, Rail Labor attended the **Chinese Provinces - U.S. States Economic & Trade Cooperation Seminar** held in Seattle, WA. This was a major event during Chinese President Xi Jinping's visit to the U.S. and was attended by Governor Inslee and Commerce Director Brian Bonlender. One of the messages coming out of that event was this: Washington State seeks business investment and trading partners overseas. While we

wholehearted agree with growing our trade dependent economy, we must have the infrastructure in place to accommodate such growth. Further, trading partners must know for certain every project, regardless of commodity, will receive a fair, unbiased, and timely evaluation.

In closing, the MBT-Longview Coal Export Terminal represents a critical upgrade to Washington state's interstate and international trade infrastructure. Any further delays in completing the permitting process must be avoided. Please issue the 401 Water Quality Certification needed by the U.S. Army Corps of Engineers (USCOE) no later than September 30, 2017. Considering the permitting process began nearly five and one-half years ago, and the fact DOE has already had the JARPA for an entire year, we believe there has been adequate time to evaluate and process all the salient information contained therein. Thank you.

Respectfully yours,



Herb Krohn, Director
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