



## Alcoa Primary Metals

Intalco Works  
4050 Mountainview Road  
Ferndale, WA 98248 USA

Wenatchee Works  
6200 Malaga Highway  
Malaga, WA 98828 USA

November 18, 2013

Millennium Bulk Terminals-Longview EIS  
c/o ICF International  
701 Second Ave., Suite 550  
Seattle, WA 98104

U.S. Army Corps of Engineers  
c/o Danette Guy  
2108 Grand Blvd.  
Vancouver, WA 98661

Washington State Department of Ecology  
c/o Diane Butorac  
PO Box 47775  
Olympia, WA 98504

Cowlitz County Building and Planning  
c/o Elaine Placido  
207 4<sup>th</sup> Ave. N.  
Kelso, WA 98626

Via U.S. Mail & to [comments@millenniumbulkeiswa.gov](mailto:comments@millenniumbulkeiswa.gov)

### **RE: Notice of Intent to Prepare an Environmental Impact Statement (EIS) for the Millennium Bulk Terminals Longview Shipping Facility Project; Scope of Environmental Review**

U.S. Army Corps of Engineers, Washington Department of Ecology and Cowlitz County:

Alcoa appreciates the opportunity to provide comments during the public participation process for the scoping of the proposed Millennium Bulk Terminal Longview (MBTL) EIS. Alcoa and the employees of Wenatchee Works and Intalco Works are proud to operate in Washington state and have been partnering with our communities and region since 1952 and 1965, respectively. We employ nearly 1,100 employees in family-wage manufacturing positions and indirectly create an additional 3,160 jobs in the state and region. We are responsible operators with a keen focus on sustainability, having reduced our greenhouse gas emissions by 72% versus 1990 baseline levels. Our operations and employees are community partners and stewards of the environment and, together with Alcoa Foundation, annually contribute nearly \$500,000 and thousands of volunteer hours to benefit local non-governmental organizations focused on the environment and education. We care about this state and the people who live here.

Alcoa commends Cowlitz County, WA State Department of Ecology (Ecology) and U.S. Army Corps of Engineers (USACE) in their respective and collective efforts to work with an array of agencies, tribes, hundreds of stakeholder interest groups, and the interested public in the scoping and project handling of the Millennium Bulk Terminals EIS. The energy your leadership has committed to the National Environmental Policy Act (NEPA), and State Environmental Policy Act (SEPA) scoping processes offers all stakeholders the opportunity to weigh in on these proposals.

However, Alcoa has several concerns about how this process will impact Washington state, businesses that currently operate here and those that would consider opening or expanding here. We agree with agency leads that all applicable project proposals should receive a thorough review under the SEPA and/or NEPA processes, a process that has been noted should be "fair, objective and rigorous." Our comments focus on the process

timing, transparency and adaptation of scope, with the goal of ensuring that businesses can and will be able to protect the environment while also sustaining and growing economic impact.

With regard to the scoping of the MTBL EIS, we ask you to consider the following:

**1) The review process should be carried out within a reasonable amount of time:**

We encourage the EIS co-leads to facilitate these reviews, and all evaluations subsequent and similar, in a reasonable timeframe. Companies attempting to make investments, contribute to the economy and create jobs should have a reasonable level of certainty in timing of these processes. The planning and pre-scoping process commenced after 18-months, with very little additional information made available to the public. We understand the subsequent review is expected to also be lengthy. This should be a concern for all businesses operating or considering operations in Washington state; a lack of certainty about regulatory process hinders the ability to make critical investment decisions and could consequently push potential investors away from the state and deter existing entities from considering additional development.

**2) EIS processes should be transparent, using clear guiding principles outlined in NEPA and SEPA for the review of project proposals:**

It appears that the state has elected to amend a clearly defined SEPA process in order to begin using a case-by-case method of analysis, without any clear direction on how certain impacts will be assessed or how far beyond the actual project the analysis will reach. We believe this scope deviation is a change in the interpretation of SEPA's intentions with no clear direction to the public as to how the state will assess specific concerns within these process adaptations. It seems target the trade and use of a commodity; Alcoa does not believe NEPA or SEPA were intended by those who wrote them to apply to actions taken by countries we trade with nor by the citizens of those foreign countries.

If this type of "creep in scope" is allowed to continue, it puts at risk businesses that rely on clearly defined principles of SEPA in order to make investment decisions. In allowing the scope of this EIS to expand beyond what we believe impact studies were specifically designed for, subjectively targeting a specific product, regulators will push capital investment away to more business-friendly states and countries, in turn pulling all direct and indirect economic benefit away from the people of Washington state. If there is lack of transparency with respect to a scope of review, it reduces the ability for companies to make investment decisions based on what should be a clearly known, reasonable regulatory path.

Alcoa's operations in Washington state are dependent upon MBTL's safe and responsible operation of the Longview site. Their role is vital to Alcoa Wenatchee Works, where 465 employees depend on MBTL receiving alumina by ship at Dock #1, transferring it onto railcars and sending it to Wenatchee to be smelted into primary aluminum, a key material for many products made in the Pacific Northwest US and a critical component of light-weighting in the automotive and aerospace industries.

Alcoa believes all applicable projects should receive a rigorous and objective review, within an efficient and timely process that has not been significantly adapted beyond what the processes were designed to evaluate. We encourage the leads to consider the objectiveness and transparency of the decisions that are made in the scoping of this project and the consequences, whether intended or unintended, that your decisions may have.

Thank you once again for the opportunity to share our perspective on this important issue. Please do not hesitate to contact us to address any questions you may have regarding Alcoa's views on this issue. We can be reached at the email addresses listed below.

Respectfully,



Barry Hullett  
Plant Manager  
Alcoa Intalco Works  
[Barry.Hullett@alcoa.com](mailto:Barry.Hullett@alcoa.com)



Don Walton  
Plant Manager  
Alcoa Wenatchee Works  
[Don.Walton@alcoa.com](mailto:Don.Walton@alcoa.com)