

January 21, 2013

GPT/Custer Spur EIS  
c/o CH2M Hill  
1100 112<sup>th</sup> Avenue NE Suite 400  
Bellevue WA 98004



The Community Food Co-op is a consumer-owned natural food grocery retailer that has been a reliable source of quality products and honest information in Whatcom County since 1970. The Co-op has two locations, a 15,000 square-foot store in downtown Bellingham and a 17,000 square-foot store in the Cordata neighborhood. We are recognized for our commitment to building community and supporting a vibrant local economy.

The Co-op is the tenth largest cooperatively owned grocery retailer in the US. In 2012 our stores will have sales in excess of \$29 million from over one million transactions. The Co-op is a major employer with an annual payroll of \$4.8 million and over 200 local residents on staff.

A significant percentage of Whatcom County households are Co-op members. Our active membership numbers over 18,000 households, 15,000 of which are in Whatcom County. Co-op members live and work throughout Whatcom County; approximately 2,500 of our active Whatcom County members live outside Bellingham.

As a business that is committed to continued success and to the well-being of the community we serve, we are writing to request that you include in the Environmental Impact Statement for the proposed Gateway Pacific Terminal a study of the effect on agriculture. In particular, please consider:

- Coal loss or coal runoff from transport and terminal operations on farmers' ability to produce conventional and organic products of suitable quality for the local market
- Diesel particulate pollution from transport on farmers' ability to produce conventional and organic products of suitable quality for the local market
- Health impacts on farmers working along the rail line that spend most of their time outside and are more likely to inhale air pollutants, such as diesel particulates, from trains
- Storm water runoff, operations runoff, and water usage by terminal operations on the availability and quality of water for agricultural production for the local market
- Noise and vibration on dairy cattle health and production.

The Co-op brand is closely identified in the public mind with locally grown organic produce. Disruption to our supply of local, organic products or diminishment in the public perception of the quality of those products due to impacts from any or all of the factors listed above would have an adverse economic impact on our business and damage our brand image.

In 2011 the Co-op purchased over \$500,000 in agricultural products from individual or small groups of Washington farmers. Over \$400,000 of those purchases were from Whatcom County farmers, and many of these farmers farm land directly adjacent to or in close proximity to existing rail lines. If the quality of local produce is no longer sufficient to meet the quality standards due to impacts from any

or all of the factors listed above our clientele we will be forced to purchase products from out of the area which will hurt local producers financially and damage our brand image.

The fact that coal transport and terminal operations will result in coal loss, runoff and diesel particulate emissions is well established. Coal dust and runoff is known to contain varying amounts of heavy metal contaminant such as Lead, Mercury, and Chromium. It is also known to raise ph levels in soil. Particulate pollution from diesel emissions is also a well-documented health hazard and is associated with crop pollution and damage. The combined impact of coal loss, runoff and diesel emissions on agricultural productivity and farm worker health deserves study. The potential for significant impacts from runoff at the site is documented in the Project Information Document as are the potential for significant demands on water resources from terminal operations.

We are requesting an analysis of the economic, social, health and environmental costs—direct, indirect and cumulative—associated with the impact to our local economy. This analysis should be done in the context of both the current and likely future traffic.

We are requesting that you mitigate the risk posed to the local economy by not allowing any development or activity at the site.

Sincerely,



Megan Westgate, Board Chair

On behalf of Community Food Co-op Board of Directors:

Brooks Dimmick

Rosalinda Guillen

Steven Harper

Brent Harrison

Beau Hilty-Jones

Mariah Ross

Jim Ashby, Community Food Co-op General Manager