

January 20, 2013

Re: Gateway Pacific Terminal EIS Scoping

To Whom It May Concern:

We are writing to request that the scope of the Environmental Impact Statement for the Gateway Pacific Terminal be as broad as possible. This is an international project. The scope should be no less. At the international level, impacts to be studied should include, but not necessarily be limited to:

1. The additional CO₂ produced from burning coal. Many argue that the Powder River Basin coal burns cleaner than other coal, but the Powder River coal is also less expensive, creating demand where there may otherwise be incentive to use cleaner energy sources.
2. The additional CO₂ produced from shipping the coal. This would include mining operations, trains, ships, and even the energy used at the terminal itself.
3. Ocean acidification as a result of increased CO₂ levels.

At the regional level, impacts to be studied should include:

1. Increased rail traffic from Montana to Northwest Washington. Every town, every at-grade rail crossing will be impacted, financially and physically. Examples include:
 - a. Businesses that may find themselves on the “wrong side of the tracks” may lose business.
 - b. Inability of emergency responders to get across tracks when needed.
 - c. Traffic impacts at at-grade crossings.
 - d. Noise impacts.
 - e. Vibration from the trains on buildings, particularly older, unreinforced brick structures.
2. Increased shipping through the Salish Sea (northern Puget Sound). We understand the vessels to be used are larger than any currently traversing the area. What will be the impacts? Examples include:
 - a. Can these vessels safely traverse one of the world’s largest archipelagoes?
 - b. What will be the impact on other shipping that currently exists?
 - c. What will be the impact on Washington State and BC Ferries?
 - d. What about recreational boating?
 - e. Commercial and recreational fishing?
3. Coal dust from the trains. For example:
 - a. We understand the coal will be treated with some kind of surfactant before shipping by rail to minimize dust, but what about the surfactant itself? Is it safe?
 - b. The coal settles during shipment, and can sift down onto the rail bed. Rain will wash the coal into adjacent waterways.

At the local level, impacts to be studied should include:

1. Impacts to the herring fishery at Cherry Point. This should include impacts from coal dust that will be generated during loading of the ships, and the potential for a spill of bulk coal. Construction impacts should also be studied.
2. Runoff from the bulk coal piles.
3. The possibility of spontaneous combustion in the coal piles, and the air pollution there from.

4. Wetland impacts.
5. Wildlife impacts, including salmon and shellfish.
6. Noise impacts.
7. Decreased property values adjacent to rail tracks.

The claim of additional jobs deserves deep scrutiny. When this project was first promoted here in Whatcom County, the claim was made that it would generate 2400 construction jobs. This was at a time when we had lost about 2400 construction jobs due to the economy. Since that time, we have had a substantial recovery, and we will have a full recovery without the terminal.

I also believe that many of the jobs will be so specialized that many of the workers will come from outside Whatcom County, taking the bulk of their wages back to their own communities.

The train impacts in Bellingham alone could stymie the proposed waterfront development, further reducing job growth and economic development. I have read studies that suggest there could actually be a net loss of jobs.

Likewise, the claim for additional property tax revenues should be carefully studied. A recent article suggests that the additional revenue amounts to only about one dollar per household. This is not the windfall being suggested.

What would happen should Powder River Basin coal no longer be cost effective for Chinese consumers? U. S. coal subsidies may be terminated soon. Royalty payments are sure to increase. The Chinese are building new rail lines to access their own coal reserves. Australia and other southeast Asian countries are also trying to develop their own coal markets. This market is too risky for the development of a gigantic coal terminal that could end up being abandoned, with irreversible environmental impacts. This has happened before, in Los Angeles and Portland.

In conclusion, we believe coal is an energy source whose time has come and gone. It is ancient technology that has no place in a modern world. Its negative health effects are well documented. We understand that there are other coal sources that may well be used should this proposal not go forward. But we also believe that we as a nation, as a community, need to stand for principals before profits. We should lead by example, and say no to the Gateway Pacific Terminal. We believe that the impacts noted above are so significant as to be beyond mitigation. Therefore, we urge and embrace a “no action” alternative.

Thank you for this opportunity.

Sincerely,

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