



CITY OF
PORTLAND, OREGON

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GPT/Custer Spur EIS
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RE: Scoping Comments on the Gateway Pacific Coal Export Terminal at Cherry Point

To whom it may concern:

This letter is submitted to the the public record for the Gateway Pacific Terminal coal export project proposed at Cherry Point, Whatcom County, Washington, facility site ID #22237.

The impacts of coal export at Cherry Point extend far beyond the terminal, reaching into every community located along the rail line between the coal mines and the export terminal, and even to communities outside the state that will be affected by the climate impacts of these proposals.

As an elected decision maker in the City of Portland, I deal with many projects that coordinate and emphasize policies of sustainability especially as it relates to environmental and climate related actions. We in the Northwest pride ourselves in achieving environmental protection goals that will aid the entire region in achieving climate action benchmarks. Proposed coal export plans for the Pacific Northwest jeopardize all of our past and future gains on this front. Recently I sponsored a Resolution that was unanimously passed by City Council that opposed the shipment of Coal by rail through our community. We support job creation. Job creation must provide a sustainable and healthy environment for our region. New economic development must therefore occur in a way that is balanced with the protection of public health, the environment and existing economic activity in our respective jurisdictions and the region as a whole.

I have a responsibility to safeguard my constituents' economic interests, health, and the natural environment. Therefore, I respectfully request that the U.S. Army Corps of Engineers, Washington Department of Ecology, and Whatcom County (collectively "the lead agencies") fully disclose and carefully assess the impacts of the Gateway Pacific Terminal on our community and the broader region.

Pacific International Terminals, a subsidiary of SSA Marine, proposes to export 48 million tons of coal annually. This coal will travel in uncovered rail cars from the Powder River Basin through dozens of individual communities in Oregon and Washington en route to the proposed Whatcom County terminal. Aside from the impacts of coal export at and near the terminal, the Environmental Impact Statement (EIS) must examine the impacts of coal trains and the coal export industry on communities along the transportation route, and national treasures like the Columbia River Gorge. . This includes the direct, indirect, and cumulative impacts of coal export on public health and safety, local economies, water and air quality, public investment, climate change, resources of the Columbia River Gorge National Scenic Area. These impacts are described in greater detail below:

Alternatives Analysis

I urge the lead agencies to complete a robust analysis of alternatives to coal export at Cherry Point, including export of other commodities, the use of the property by other industries, and a "no action" alternative.

Public Safety Impacts: The safety of our community is my highest priority. The increase in train traffic has the potential to harm our community by leading to more frequent accidents, including train derailments and delays in emergency response time.

Public Health Impacts: Coal is commonly transported in open top rail cars, contaminating local air quality, infrastructure, open spaces, farms, forestland, streams and rivers with coal dust, chunks of coal, and diesel pollution. The EIS must take a hard look at the impacts coal export.

Climate Change: Burning coal leads to increased emissions of greenhouse gases and climate change. In turn, the EIS must assess the negative impacts to quality of life, public health, and the environment which are associated with climate change. This includes the impacts of climate change in our community; ocean acidification, increased likelihood of reduced snowpack, flooding, summer droughts, and forest fires risk; and quality of coastal and near-shore habitat. We must all share the responsibility to reduce climate change by making each decision as if our planet's survival is at stake.

Economic Impacts: A strong economy is vital to the well-being of our community. Increased train traffic has the potential to slow the growth of existing businesses and damage property, thus reducing the likelihood that new businesses will take root in this community. Coal trains' blockage of freight traffic at intersection must be evaluated and considered.

Cumulative Impacts: The lead agencies should assess the cumulative impacts of the Gateway Pacific project and existing rail traffic, as well as projected increases in rail traffic from other coal export proposals. Currently, five ports are considering coal export proposals, which, together, could transport more than 140 million tons of coal through the region. For example, the lead agencies should assess the cumulative impacts resulting from the emissions of greenhouse gasses that would result from the proposed combustion, mining and transportation of coal that would be handled by the proposed coal export facility at Cherry Point. In doing so, the lead agencies should assess the totality of greenhouse gas emissions associated with all of the coal export facilities that are currently proposed for the West Coast, and the lead agencies should not only consider the total emissions but also the resulting impacts to climate change and the associated impacts on human health and natural resources resulting from rising temperatures, changing climatic patterns, rising sea levels, and increasing ocean acidification.

It is important that the Army Corps of Engineers conducts an area-wide Environmental Impact Statement that assesses the cumulative impacts of the five Northwest coal export proposals.

Thank you for considering my requests, and for your careful analysis of these impacts that affect us all.

Sincerely,



Amanda Fritz
Commissioner, City of Portland