October 22, 2012

Mr. Randal Perry
USACE, Seattle District
c/o EIS Co-Lead Agencies
1100 112th Ave. NE, Ste 400
Bellevue, WA 98004

Comment re: **Recommendation**, **EIS Scope, GPT/BNSF Custer Spur**

Everett Shorelines Coalition (ESC) is a non-profit citizen group that works in support of healthy shorelines and aquatic habitat for humans and wildlife, and compatible uses of waterfront and nearshore waters of Port Gardner Bay and the Snohomish River estuary, consistent with Washington State's Shoreline Management Act.

Based upon our local Everett and Mukilteo shorelines history of multiple dedicated-purpose bulk-storage and shipping facilities, past and present (*see following page*), we recommend inclusion of specific elements described below in the scope of EIS required by the Joint SEPA agencies for the proposed Gateway Pacific Terminal facility.

Because current and prospective world market conditions continue susceptible to major shifts in cost/benefit factors, dependence upon automation for bulk commodity transfer processes, and competition from other bulk shipment terminals for export/import, the scope of EIS requirements should include accurate characterization and evaluation of

- projections of actual revenue adequacy not only for facility operating and business expenses, but also for costs of ongoing monitoring and protection of the site's natural environment and mitigation and remediation of environmental damage or decline.
- economically viable convertibility of special purpose structures to eventual adaptive alternative uses or salvage, independent of "coal trains" and railroad track issues.
- three categories of habitat impairment risks, either cumulative or in the event of cargo spill: A) industry track records (literally) for bulk commodity transport – cargo spills/derailments/collisions and cleanup, B) vulnerability of shore storage area, spur track(s) and adjacent wetlands to potential lurch of the Juan de Fuca plate (fracture or liquefaction or flooding) and C) the site's exposure to seaborne alien/invasive species via ships docking at the terminal pier.

ESC expects that these last three already have been recommended by Whatcom County environmental stewardship supporters.

Since Washington's Shoreline Management Act ranks **State** interest as first in priority, ahead of local interest, and there is no GPT proposal of value-added processing on-site (or nearby) of any of the bulk commodities proposed for transshipment, the assessment of actual ongoing jobs estimates requires especially close scrutiny. The GPT project description implies that ships can arrive empty (no unloading operation) and trains depart empty (no re-loading operation), thus limiting the quantity of transfer operator jobs. Like Everett's past export of logs instead of value-added dimensional lumber, the proposed transport and export of bulk coal, the primary bulk product discussed in the project description, offers neither high odds of reliable ongoing net benefit to Washington State and the local community, nor of alternative ongoing bulk commodity traffic if/when the trans-Pacific coal market declines.

Below on this page is a list of local Everett facilities and structures that we consider examples relevant to the scoping we're recommending for the GPT EIS.

Everett/Port Gardner Bay bulk-commodity transfer facilities.

Each of these (*see list below*)

- is associated with either a Port of Everett enterprise or former U.S. Military fuel-transfer functions
- is served by rail connections with dedicated spur tracks (currently BNSF)
- includes structures with life spans that readily outlast their original function but lack economically viable convertibility to replacement uses.
- impacts adjacent marine or wetland ecological function

Three examples of these facilities along Port Gardner Bay sit unused or underused:

Alumina storage/transfer facility – Port of Everett has been unsuccessful in attracting any ongoing replacement bulk commodity product to its waterfront alumina transfer/storage dome, ever since the original destination aluminum plant shut down. (Powdered limestone for cement mix was tried, but discontinued.)

WWII-to late 1980's fuel tank farm and pier (unused since, storage tanks removed) -- Port of Everett was unable to generate any economically viable redevelopment plan for the property offered by USAF for transfer to the Port of Everett at no-cost. (Washington Dept. of Transportation's recent proposal to eventually use part of the site for relocation of its Mukilteo ferry terminal will require costly removal of the old fuel transfer dock, plus remedial environmental cleanup of its underlying tideland.). A portion of the tank platform may be adaptable to support of eventual ferry loading or parking area

Boeing barge-to-rail pier (since renamed "Mt. Baker Terminal") -- originally built (with Washington state subsidy) as "essential to delivery of oversize aircraft sub-assemblies" up Boeing's Everett Plant spur track, in support of anticipated 787 production, turned out unneeded for 787s production from the beginning. Instead it is used only for barge deliveries of 777 components to the Boeing rail spur, at a very low rate: only about 3 barge loads per month, compared to far higher as-built capacity

These facilities illustrate the difficulty of assessing long-term economic and community benefits, risks, and trade-offs in project proposals to convert natural land and water assets to new and structurally-specialized uses such as the Gateway Pacific Terminal. We hope that the broad public interest in this proposed project will result in a very thorough, comprehensive EIS.

Thank you for considering our comment.

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