

Department of Ecology
Corps of Engineers
Whatcom Planning Commission

November 1, 2012

Greetings:

The export of coal from the Powder River basin threatens to impose a myriad of negative impacts on the natural resources of the Pacific Northwest. The Corps of Engineers, Department of Ecology and Whatcom County Planning have a legal obligation to consider all of these impacts in determining whether the proposed coal export activities are in the public interest. The science has developed to the point where we now know that we cannot simply export coal to Asia and then close our eyes to the potential impacts of the ultimate combustion of that coal to power the foreign economies of developing countries. The exportation of Powder River Basin coal will inevitably subject the American public to toxic air pollution associated with well-known and harmful by-products of coal combustion, and your departments must assume the responsibility of assessing these impacts on behalf of the American public.

Coal dust threatens to cause adverse impacts to humans and marine life including salmon. A study published in 1997 noted how coal dust can enter the aquatic environment as a result of "storm water discharge, coal pile drainage run-off, and when coal dust from storage piles, transfer conveyor belts and rail cars becomes airborne and is deposited in the surrounding environment (i.e. fugitive coal dust) (Xuan and Robins, 1994).

As well as the danger to salmon, there is the same danger to other marine life in the Salish Sea such as Orca Whales, sea lions, seals, otters and shellfish. Many people make their living in fishing and tourism industries especially in the San Juan Islands. Toxic water is bound to affect these industries if the fish, Orcas and shellfish die off. I request that the Corps evaluate the impact to marine life in the Salish Sea from coal and coal dust and guarantee that those resources will not be harmed.

Over recent years, human activities such as the burning of fossil fuels have increased the amount of carbon dioxide gas emitted to the atmosphere— and the amount that dissolves into the ocean. Now, so much carbon dioxide has been absorbed by the ocean that the chemistry of seawater is changing.

Storm water and waste water releases from coal storage facilities are typically acidic, and coal runoff may contain high concentrations of copper, iron, aluminum, nickel, and other constituents present in coal. I also emphasize the importance of your departments seeking and obtaining a certification of compliance with water quality standards from the Washington Department of Ecology pursuant to Section 401 of the Clean Water Act.

PRB coal is also known to be particularly susceptible to the formation of coal dust, because of its friable nature and the fact that PBR coal degrades rapidly once removed from the mine. Communities throughout the West - from the mines in the Rocky Mountain states to the rural communities along the rail lines and in the Columbia River Gorge, and urban communities in Portland, Vancouver, and Seattle -- are threatened by coal dust, diesel emissions, traffic and safety issues, and the adverse economic consequences of pollution and conflicts with other commercial and residential activities.

Your departments face a critical decision that will have lasting impacts on the American public and the human environment for many years and generations to come. The fundamental question presented to the Corps, the Department of Ecology and Whatcom Planning Commission for the first time by this permit decision is whether the large-scale export of Powder River Basin coal to Asian countries serves the interests of the American public. Given the fact that numerous, large-scale coal export proposals are currently pending on the West Coast, I cannot emphasize enough that the process used to reach a decision and the decision itself will set important precedent that will establish federal policy with respect to West Coast coal export more broadly. As a nation, we are investing billions of dollars in moving to a lower carbon economy, recovering runs of native Pacific Northwest salmon, cleaning up our air and watersheds, and planning and building sustainable and livable communities. The export of coal to Asian countries would undercut these billions of dollars that we are investing to create a better future for our children and grandchildren – future generations.

I ask your departments to use the best science available to determine the negative effects of shipping coal to a proposed terminal in Cherry Point and if the water quality will be degraded by such a terminal that the permit be denied.

Sincerely,
Diane Kaufman
Friday Harbor