

Date: January 21, 2013

To: Mr. Randel Perry, US Army Corps of Engineers
GPT/Custer Spur EIS Co-Lead Agencies
Washington Department of Ecology
Whatcom County Council
comments@eisgatewaypacificwa.gov

From: Gary Bornzin
3647 S. Heather Pl.
Bellingham, WA 98226
garybornzin@hotmail.com

Subject: Comment regarding the scope of the Environmental Impact Statement for the Gateway Pacific Terminal project proposed for Cherry Point (near Bellingham city) in Whatcom County, WA. Docket number COE-2012-0016. Please include my comments in the public record.

As a university professor who has studied, taught, and advocated environmental, social, and economic sustainability for over thirty years, I respectfully request that you include and address thoroughly in your Environmental Impact Statement (EIS) *all* of the environmental, health, safety, and economic costs associated with the SSA Marine proposal. I list some of them below.

There are two major environmental impacts that I especially urge you to consider and calculate carefully, for it appears evident based on rough estimates (detailed below), that **the costs of these two environmental impacts alone far exceeds any projected benefits from the proposed project.** These two impacts are:

- Human deaths resulting from the burning of coal.
- Human deaths and other costs associated with human-caused global warming.

Why non-local impacts must be considered

Tragically, our economic system allows corporations to “externalize” the costs of their projects onto others, the rationale being that these costs are small *per person*. But when a small cost is borne by 7 billion persons, the total cost may be enormous and the project should be, but rarely is, prohibited. This failure is the well-known “Tragedy of the Commons,” by which commons are destroyed by systemic failure to disallow individual profiteering at the expense of others who share the commons.

In the absence of economic policy (such as a carbon tax or a cap-and-trade system that begins to internalize the external costs of coal burning, for example), it falls upon the EPA, the State Department of Ecology, and the Army Corps of Engineers to use the EIS process to calculate those costs and require that they be “paid” or “mitigated” by the applicant before the proposal may be permitted to go forward. **To avoid a tragedy of the commons, it is imperative, therefore, that an EIS consider *all* external costs, *all* environmental impacts, of a proposed project.**

Human deaths resulting from the burning of coal

I understand that those who draft the EIS are responsible for researching the most reliable figures available. As a start, a credible authority¹ has calculated that worldwide about 170,000 people die each year from the burning of coal for electrical generation. The world burns about 4.5 billion tons of coal per year.² SSA Marine proposes to ship 48 million tons a year, roughly 1% of the world total.

It is fair to say, then, that SSA Marine is directly responsible for transporting the fuel that will kill 1,700 people (1% of 170,000). This figure, or a more accurate calculation of it, must be included in an Environmental Impact Statement. *This is largest impact of the proposed project. And it cannot be mitigated.*

When creating policy, the EPA sometimes uses \$7 million as the dollar value of a human life. So the externalized cost of these lives is about \$12 billion, more than ten times the dollar value of 48 million tons of Powder River Basin coal.³

Some will argue that these 1,700 people are Chinese, not American, and so should not be counted. Are Chinese people worth less than Americans?

Some will argue that SSA Marine is not burning the coal, merely transporting it. But SSA Marine knows, or should know, that their coal will be used to kill 1,700 people a year. Their proposal is as morally bankrupt as shipping gas to a concentration camp.

Some will argue that the Chinese will just buy their coal elsewhere. This is no doubt true, but it will cost them more, which will drive them toward more rapid development of renewable, and less deadly, energy sources.

Human deaths resulting from anthropogenic climate change

The World Health Organization estimates that approximately 150,000 deaths annually can be attributed to climate change.⁴ The question then is what portion of climate change is caused by burning coal? Roughly 40% is a good estimate (the burning of coal and petroleum products are the two greatest contributors to increases in atmospheric CO₂). So we have 60,000 deaths annually from that portion of climate change caused by coal burning, with SSA Marine responsible for 1%. **So SSA Marine would be responsible for an additional 600 deaths per year if their proposal is approved. Some of these deaths will be here in the U.S. (we'll never know which ones exactly), caused by the more extreme weather events caused by global climate change.**

Because these figures (2,300 total deaths per year) are so large, it is imperative that the scope of the EIS include the impacts of this project, not just in Washington State but in China as well, for an accurate estimate of these deaths should surely be considered when deciding whether to proceed with this project. In fact, I should think that knowledge of the large number of deaths should even persuade SSA Marine to cancel their proposal!

Other impacts to include in the EIS

1. Air pollution from:
 - a. Coal dust—on site and from coal trains
 - b. Diesel particulates—from train engines and cargo ships
 - c. Auto exhaust from cars idling at blocked rail crossings
 - d. Port operations
 - e. Coal burning in China—measurable on the West Coast...causing or increasing:
 - a. Premature deaths
 - b. Respiratory infections
 - c. Asthma, COPD, emphysema
 - d. Heart disease
 - e. Cancers
2. Water pollution
3. Noise pollution, with attendant stress and health effects, lost concentration, lost work hours.
4. Blocked rail crossings, which impact...
 - a. Emergency vehicles, resulting in possible loss of life and property
 - b. Delivery vehicles
 - c. Timely arrival of passengers at the ferry and bus terminals
 - d. Other automobile traffic
5. Rail lines blocked by slow moving coal trains impede Amtrak passenger trains.
6. Coal trains back up when tracks are blocked by mudslides, which are not infrequent.
7. Frequent trains necessitate a complete rethinking of the development of the Bellingham waterfront, with *significant loss of commercial value and aesthetic value*.
8. Frequent trains detract from Bellingham's appeal to businesses, residents, and tourists.
9. Frequent noisy and polluting trains reduce property values.
10. SSA Marine is likely to import many of their own managers and other workers from elsewhere. Additional unemployed spouses and children will initially add to unemployment rolls and put more strain on schools and public services.
11. Some studies have shown a net economic loss to the county. The EIS should diligently examine both economic gains *and losses*.
12. 48 million tons of coal (about 5% of U.S. consumption) contains approximately 2.4 tons of mercury.⁵ Are there no regulations regarding the mining, transporting, and sale of mercury? "More than 140 nations adopted the first legally binding international treaty on Saturday [Jan 19] aimed at reducing mercury emissions...a highly toxic metal."⁶ It would seem that 2.4 more tons of mercury destined to be released into the world's air and oceans flies in the face of our new treaty goals. How would approval of this project affect the U.S. image abroad?

Concluding remarks

I share the concerns of many local physicians who have already testified to the damaging effect increased air particulates will have upon the health of everyone in our city, even increasing the incidence of death from lung disease. Not only people, but pets and wildlife, birds, pollinating

bees, and insects will be affected. None of these effects/costs should be summarily dismissed as negligible. A myriad “small” effects upon thousands of people, animals, and plants add up to an enormous cost. Such costs are logistically impossible to compensate, but *are significant* and must not be ignored.

When we in the U.S. are moving past coal burning in our own country in favor of cleaner and safer energy sources, how can we in conscience send this dirty resource to the Chinese to expose their people—and us—to these dangers? Do we want jobs, regardless of costs? No!

Environmentally, *if all the costs and effects are accounted for*, I am confident there will be no gain for Whatcom County, and unquestionably an enormous loss for the world. You are charged with investigating these costs and effects. We ask you to give your EIS the widest scope possible. Thank you for your efforts to be fair and complete.

-
1. Gideon Polya, *Greenblog*, (<http://www.green-blog.org/2008/06/14/pollutants-from-coal-based-electricity-generation-kill-170000-people-annually>)
 2. http://www.nationmaster.com/graph/ene_coa_con-energy-coal-consumption
 3. http://wiki.answers.com/Q/How_much_does_one_ton_of_coal_cost
 4. World Health Organization. *The World Health Report 2002: Reducing Risks, Promoting Healthy Life*. Geneva, Switzerland: World Health Organization, 2002. (<http://www.who.int/whr/en>.)
 5. <http://pubs.usgs.gov/fs/fs095-01/>
 6. <http://www.nytimes.com/2013/01/20/science/earth/mercury-emissions-treaty-adopted.html>