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# EVERGREEN ISLANDS

November XX, 2012

To: GPT/BNSF Custer Spur EIS Co-Lead Agencies  
c/o CH2M HILL; 1100 112th Avenue NE, Suite 400; Bellevue, WA 98004

**Re: Gateway Pacific Terminal at Cherry Point Proposals**

On the behalf of Evergreen Islands, I am submitting the following comments regarding the proposals for the Gateway Pacific Terminal at Cherry Point and the Custer Spur Projects.

I strongly urge you to include the potential damage to our economy and environment from a coal storage and transfer facility at Cherry Point near Bellingham, WA. Everyone I know is pro-jobs, but those should be net new jobs, not a net loss of jobs or even a net neutral. There is a high probability that their will be a net loss in jobs should this facility be approved so I believe this should be a part of your scoping if possible.

However, the damage to our environment is clearly the major concern. The potential damage is not solely to the environs of the Cherry Point facility, but also to every mile of the rail lines on which the coal would be transported.

1. Coal dust from the coal in moving railcars is significant. This coal dust would be hazardous to every person and animal along the path of the traffic. The negative effects would not only be immediate but cumulative as the dust remains in the soil for many years. Runoff from rain would flow in to our waterways, poisoning local streams, rivers, and wells used by people, domestic livestock, and wildlife both on land and in Puget Sound. The cleanup of Puget Sound, as it is now, is of utmost importance. New pollutants which flow in to it would undo intense and expensive mitigations now for other pollutant sources and coal pollution would cause even more harm to these waters. The damage would be to salmon, shellfish, whales, and other sea life. Coal is proven to be a poison at even low concentrations to sea life. Thousands of jobs would be directly impacted by the loss of salmon alone, impacting not only local waters but other waters to which the salmon migrate. The loss of tourism dollars would be significant as well, not to mention the loss of experience of our waters to the citizens of the US who come here to enjoy the waters and sea and wild life. The damage from transport would not be isolated to the Bellingham area, but all along the rail routes involved, especially along the Columbia river.

2. Coal dust and spills at the Cherry Point facility are certainly a major concern. The west side of the Cascades has major wind, and the Bellingham area has much more than the average compared to the areas south of Whatcom County. It is difficult to imagine how the dust would be controlled in sustained high winds that we experience from many winter storms. It is hard to imagine that water spraying would mitigate the spread of the coal dust from these high winds. There would be an area of immediate and ongoing concentration of coal pollutants, which would be a hazard to the land and Puget Sound. The local waters could not sustain such an onslaught of poison. The unpreventable leaching of coal pollutants in to the soil of the facility would either runoff directly in to local streams and in to the Sound, but also in to the ground which would poison the aquifers and wells in the local area. Again, thousands of jobs and livelihoods would be in peril due to the impact on fisheries and tourism. Health costs would increase and lives would be endangered.

3. The increase of rail traffic is a major concern at each railroad crossing though out the transport route. Each stoppage of local traffic would entail thousands of pounds of extra gasoline and diesel exhaust poisons while traffic is idled waiting for the trains to pass. The savings in transport fuel would be more than offset by the increased fuel use by idling vehicles. The exhaust from both the rail traffic and the idling traffic would be enormous. Thousands of jobs are potentially harmed by the increase of stoppages which would impede personal, commercial and life-saving traffic. In many cases there isn't room for the localities to build overpasses or other mitigated traffic rerouting, e.g. in Marysville and Mount Vernon where the crossing are right next to the downtowns and Interstate 5. Emergency traffic would be severely impacted resulting in loss of life and impacts to health and safety. Commercial and residential values would plummet due to the impact of traffic and noise.

4. Global pollution is yet another concern. The impacts may be global and this includes all of us in US and here in Washington state. We have to deal with health issues, global warming, sea level rising, changes to storm numbers and severity, etc. etc.

Therefore, you should include all of the above in the EIS for this project. It does not seem to me that enough mitigation could be found to allow the project to proceed with any one of these items, and certainly not in the cumulative. The impacts are too great, and the viability of mitigating solutions is too sparse. However, the EIS process will have to come to its own conclusions and I trust it will be the right ones for our both our environment.

Respectfully yours,

Joseph E. Barnes, Trustee