James R Rothwell

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December 28, 2012

GPT/Custer Spur EIS
c/o CH2M HILL
1100 112th Avenue NE
Suite 400
Bellevue, WA 98004

Email copy to comments@eisgatewaypacificwa.gov

RE: Scope of Environmental Impact Study for GPT

As a concerned citizen, I appreciate the opportunity to provide further comment on the GPT project and specifically the EIS scoping considerations.

My earlier letter dated May 11, 2012 (see attached) was primarily concerned with the inadequacies of the Project Description which did not consider the major rail traffic impacts for coal transportation from Montana/Wyoming to the Pacific Northwest. This remains a key issue that must be addressed in the EIS.

The following rail transportation factors should be considered and mitigation steps identified:

1) Many communities and individuals will have increased train noise, diesel fumes, coal dust, traffic congestion and other consequences. The health, safety and environmental impacts thereof need serious study.

2) The existing rail line was never intended to handle such large volumes of coal. A complete traffic simulation study should be done to determine whether the existing system is adequate to handle the vast increase in coal traffic. What limitations will this project place on current and planned passenger and freight rail traffic in the Northwest? Is coal traffic the best use of the existing rail capacity?

3) The costs of rail system upgrades and improvements should be borne by the project developers and not by the communities impacted and the citizens living in those communities. An important element of the EIS should be to identify infrastructure requirements caused by the increase in rail traffic (e.g. improved RR crossings, steps to maintain access to the Bellingham port area, emergency considerations). Citizens need to know if they will be expected to pay for any of these improvements, and if so, citizens should have a voice to participate in the process.

4) Coal dust losses during transport from the mines to the Pacific Northwest are currently at unacceptable levels and BNSF acknowledges the need to improve this situation. Losses can be 3% or more according to BNSF, meaning 3 tons for each coal car or 300 tons for a 100 car train. Assuming 10 loaded trains per day, over 3000 tons spill or will blow out each day from the coal traffic. The coal cars should be covered during transit to reduce the adverse consequences for all communities along the rail line.

Beyond the rail issues, several other factors should be considered.

At the port site itself, the environmental impacts of the large coal stockpiles, the ship loading operations, and the significant increase in large bulk carrier traffic need to be considered. Is there earthquake risk in the area of the port site? If so, what remedial steps will be taken in the construction process and during operations?

Another area that merits inclusion in the EIS is a current global coal market study. The proponents of the project (Peabody Coal, BNSF, GPT) expect to achieve long term coal export sales to the Far East. However, there are at least two additional considerations. Competition exists from other coal producers who are in closer proximity to the Asian market (e.g. Australia, Indonesia, South Africa, Mongolia, as well as increased Chinese production). Alternative fuels, such as natural gas (with less adverse environmental affects) also raise questions about market sustainability.

Further in this regard are the questions of clean-up and reclamation costs. How do the project proponents propose to ensure that these costs will be covered at the end of the project or if the market viability of the project collapses? Funds to cover such costs should be deposited by the GPT developers up-front to ensure local citizens will not be left with an environmental mess or the expense of clean-up themselves.

There are a number of coal export facilities proposed for the Pacific Northwest. The GPT project EIS should not be looked at in isolation. Instead, an overall study should be done of all the proposed projects and the GPT proposal should

be considered in that context. Alternatives that do not require coal trains to travel up the Washington coast would seem preferable relative to environmental and economic considerations.

The GPT project will create a number of direct and indirect jobs that will benefit the local economy in Whatcom County. This factor needs to be considered in the EIS along with the plans to encourage local hiring to fill these jobs. At the same time, there could be job losses in other industries such as tourism and fishing as a consequence of this development. Bellingham and Whatcom County are regarded for their physical beauty and have a reputation for environmental sensitivity that is inconsistent with becoming the home of the largest coal export facility in North America. If possible, the potential loss of jobs due to these factors should be quantified.

Thank you for the opportunity to provide input for the EIS scoping process. I look forward to following and participating in the process as it moves forward.

Sincerely,

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May 11, 2012

Whatcom County Planning Office
5280 Northwest Drive
Bellingham, Washington 98226

Attention: Tyler R. Schroeder, Planning Manager

Subject: Notice of Application for Gateway Pacific Terminal Project (GPT)

Thank you for your letter dated April 16, 2012. I appreciate the effort by Whatcom County Planning and Development Services to keep the public informed and to provide an opportunity for comment on the proposed application.

Economic development and job creation are important to maintaining healthy communities. I worked for a global mining company for nearly 30 years and was involved in a number of major project developments. One of the fundamental lessons from those experiences was the need for involvement by all impacted parties in the process. It can determine whether or not a project proceeds and its level of acceptance once in operation. Thorough community consultation and evaluation of impacts is essential to building credibility and support. In this respect the GPT proposal falls far short.

My primary concern is that the scope of this application is too limited. It deals almost exclusively with the potential impacts in the area of the approximately 1200 acre Cherry Point port site and the rail connection and improvements at the Burlington Norther Santa Fe (BNSF) rail yard in Custer. However this is not just a port project. What about the impacts of transporting up to 54 million metric tons of coal per year from Wyoming and Montana to Northern Washington? This project will result in a quantum leap in coal traffic.

Section 4.3.5 Rail Access of the Application (page 116) concludes, "No interdependent projects have been identified on the BNSF Railway's mainline--Bellingham Subdivision, or any other portion of BNSF Railway's infrastructure. BNSF Railway would be the permitting applicant for any needed permits to complete improvements on the Custer Spur. BNSF Railway would rely on this document to provide disclosure of potential effects under the requirements of NEPA and SEPA."

In other words, neither Pacific International Terminals, Inc. (PIT) nor BNSF intends to deal with the major rail transport impacts. This is unacceptable. The EIS must include evaluation of the impacts of rail transport from the mines to GPT. Many communities and individuals will have noise, coal dust, traffic congestion and other consequences. PIT and BNSF are doing themselves a disservice by not proactively addressing the concerns of impacted communities.

BMSF may believe that it can do whatever it wants over its rail right of way and just stay out of the process. However, its rail line was never intended to handle such large volumes of coal and it would be surprising if upgrades to the mainline were not required to deal with this vast volume increase. Even railroads with significant legal rights must ultimately rely on the good will of the people in the vicinity of their operations.

I would suggest that a complete traffic simulation study be done to determine whether the existing mainline track is sufficient to handle the 54 million metric tons of coal traffic in addition to the current and planned passenger and freight trains.

After further review, additional comments may be offered regarding the Application. At this stage it is most important to comment on the need for the EIS process to involve impacts beyond the limited scope addressed by PIT in its Application. BNSF should also be directly involved in the process.

Thank you for the chance to provide input and I look forward to continued involvement.

Sincerely,

James R. Rothwell

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