

January 18, 2013

GBT/BNSF Custer Spur EIS Co-Lead Agencies  
c/o CH2M HILL  
1100 112<sup>th</sup> Ave NE, Suite 400  
Bellevue, WA 98004

RE: Public comment period on EIS scoping – Letter of Support

The Puget Sound Clean Air Agency is a regional air quality management agency serving King, Kitsap, Pierce and Snohomish counties. Our mission is to maintain healthy air quality and protect our climate. Because the proposed Gateway Pacific Terminal and Custer Spur modifications would impact the air quality and climate in our four counties, we are providing specific scoping comments to ensure the environmental impact statement (EIS) for the project thoroughly identifies and analyzes the air quality and climate effects in our jurisdiction.

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**A. Potentially Affected Resources and Extent of Analysis of those Resources**

1) Direct and Indirect Effects on King, Kitsap, Pierce, and Snohomish County Air Resources and Climate Resulting from the Project Should be Considered in the EIS

The proposed project would facilitate rail shipment of large quantities of bulk commodities through at least Snohomish County, and very likely King and Pierce counties as well. The proposed volume of coal would be approximately equal to four percent of national coal production. The potential increases in rail activity in our region would be substantial, and the levels of other activities associated with the project would also increase considerably. The large scale of potential project-induced activity in, near, or affecting one or more of our counties warrants careful analysis, even though the proposed terminal would be in Whatcom County. The EIS should thoroughly analyze the direct and indirect effects of the proposed project on our counties' air resources and climate, and on the people who live there, including but not limited to environmental justice communities and the built and natural environment.

*a. Activities*

At a minimum, the EIS should quantify and analyze direct and indirect effects in King, Kitsap, Pierce and Snohomish counties of air pollutants and greenhouse gases to be emitted from the following project-related sources:

- Locomotive engines
- Fugitive dust (coal or other commodities) from railcars while in transit (e.g. through our counties) to the proposed terminal
- Combustion of coal that is enabled by the project
- Idling of on-road vehicles at railroad crossings while waiting for all trains

related to this project

- All indirect changes in locomotive activity (e.g. idling of non-project-related locomotives) due to increased rail congestion caused by this project
- Ships coming to and leaving the terminal

*b. Pollutants*

Air pollutants listed below should be quantified and analyzed from each of the above sources in section A(1)(a), as applicable:

- Diesel particulate matter
- All relevant criteria pollutants
- All relevant hazardous and toxic air pollutants
- All relevant greenhouse gases
- Black carbon
- Mercury

*c. Analyses*

The EIS should quantify and analyze the following effects of the project:

- Effects on ambient air concentrations of all relevant criteria pollutants and toxic or hazardous air pollutants. Dispersion modeling, global chemical transport modeling or other appropriate quantitative modeling should be used to determine potential ambient air concentrations. (Transport of air pollutants resulting from overseas combustion of project-related coal should be considered as a potential effect.)
- Effects on local air quality alongside rail corridors in King, Pierce and Snohomish counties, and the communities in these corridors.
- Health effects associated with increased ambient concentrations to be caused by the project. This analysis should include evaluation of impacts on communities already burdened by air-related health impacts and/or other identified environmental justice communities.
- Effects on the climate from pollutants emitted from all sources of air pollution listed in section A(1)(a) above, including the coal combustion enabled by the project, in a qualitative or semi-quantitative analysis. We ask the co-lead agencies to research how other EISs are addressing cumulative impacts on climate change to ensure that the effects described in this paragraph are adequately identified and evaluated.
- Effects from deposition of black carbon onto snow in the Cascade Mountains, including, but not limited to, effects on snow melt and surface temperature and the impact these effects would have on power generation, water supplies, and recreation. A study that could help guide this analysis is “Measured black carbon deposition on the Sierra Nevada snow pack and implication for snow pack retreat” published in the Atmospheric Chemistry and Physics journal, <http://www.atmos-chem-phys.net/10/7505/2010/acp-10-7505-2010.pdf> . We request this study be reviewed and considered.
- Effects on ecosystems and human health from deposition and bioaccumulation of air pollutants into the Puget Sound, rivers, and lakes. Relevant pollutants include mercury, polycyclic aromatic hydrocarbons, metals, other hazardous air pollutants, particles, ozone precursors, and peroxyacetyl nitrate. A global transport model should be used to quantify deposition.
- Effects on ecosystem acidification from increased levels of carbon dioxide from the coal combustion enabled by the project, including ocean acidification.

2) Cumulative Effects on Air Resources from the Project and all other Past, Present and Reasonably Foreseeable Projects

The EIS should thoroughly analyze the cumulative effects associated with the proposed project by analyzing the incremental impact on the counties' air resources, including climate, of the project added to all other projects past, present and reasonably foreseeable in the future, regardless of who is proposing – or may propose – the other projects. Other projects should include, but not be limited to, the proposed Millennium project in Longview, WA and the other terminals under discussion including: Port of St. Helens/Port Westward, OR; Coos Bay, OR; Port of Morrow, OR; Port of Grays Harbor/Hoquiam, WA; and Westshore, Roberts Bank, British Columbia.

This should include the cumulative effects of all currently proposed or reasonably foreseeable projects that would impact the air resources, including at least all proposals that would increase train traffic along the same corridors and those that would increase coal combustion. The activities, pollutants, and analyses described in the "Direct and Indirect Effects" section above should also be analyzed for cumulative effects. Note that proposed terminals south of our agency's area might result in rail traffic through Pierce, King and Snohomish counties unless these projects' proponents have committed otherwise.

Cumulative effects should be analyzed over the entire life of the potential project impact and not just the life of the project. The timeframe for determining which future projects to include should be at least as far into the future as the date by which all currently proposed or reasonably foreseeable similar projects would be operational.

3) Incomplete Information

We understand that there may be elements of the analyses for which perfect information is unavailable at the time. In these circumstances, the EIS should be based upon conservative or worst-case assumptions, rather than omitting quantifying or analyzing relevant effects. See for example, WAC 197-11-080. For example, if at the time of the analysis it is not known whether trains would pass through a particular location, more precise project information should be obtained. If that cannot happen, then the EIS should assume that they would pass through that location, in both directions (loaded and empty). The EIS should use this approach even if trains would be assumed to "be in more than one place at a time." The alternative is to obtain more precise project information. As another example, if at the time of the analysis it is not known where project-related coal would be combusted, the EIS should assume it would all be combusted in one reasonable worst-case location to ensure that adequate identification and evaluation of impacts is performed in the EIS.

4) Insignificance

For effects determined insignificant by the EIS, the EIS should include a description of the relative magnitude of the effects and clearly show how the conclusion of insignificance was reached.

**A. Measures to Avoid, Minimize and Mitigate Effects of the Proposals**

Although the EIS analyses are not complete, there are specific measures and actions that would minimize or mitigate the project's effects on air resources and climate. The EIS should include and evaluate these measures:

- The project should include a binding mechanism to ensure that only the lowest-emitting locomotives are used for the increased rail activity enabled by the project, such as locomotives meeting U.S. EPA Tier 4 emissions standards from 2015 on;
- The project should include binding mechanisms to ensure the best operational practices are used to minimize locomotive idling and emissions along the entire rail corridors used to serve the project;
- The project should include or ensure maximum installation of grade separations to minimize the effects of on-road vehicle idling at rail crossings along the entire rail corridors used to serve the project;
- The project should include binding mechanisms to ensure the use of the best available control technology on railcars to minimize fugitive coal dust emissions, potentially including completely-covered cars if feasible; and
- The project should include binding mechanisms to ensure the use of the best available control technology or other means to minimize emissions from ships, in transit and at berth.

#### **B. Significant Unavoidable Adverse Impacts**

Notwithstanding the above recommended measures, this proposal would likely also result in some significant unavoidable impacts. These include:

- Combustion of the coal would – for the foreseeable future – unavoidably emit greenhouse gases and black carbon. The project would exacerbate the changing of our climate.
- Due to state and federal decision-makers’ inability to require emission control devices or otherwise influence the amount of air pollution from coal combustion overseas, air pollution and human health impacts would also likely be unavoidable.

#### **C. Alternatives**

The EIS should include a thorough description and analysis of each reasonable alternative, including the no action alternative. The EIS should include, but not be limited to, analysis of an alternative that implements the project at a time when effective control measures could be used to mitigate the negative effects on our climate.

The proposed project has drawn an enormous amount of attention, including in our jurisdiction. The project’s effects would be significant and the EIS should include analyses of impacts, alternatives and mitigation measures as described in this letter. If you have any questions or would like to discuss our comments, please contact Andrew Green at (206) 689-4053. We look forward to working with you further on this important EIS.

Sincerely,



Craig Kenworthy  
Executive Director  
Puget Sound Clean Air Agency