

January 21, 2013

Whatcom County, Washington Department of Ecology and the U.S. Army Corps of Engineers  
GPT/Custer Spur EIS  
1100 112th Ave. NE, Suite 400  
Bellevue, WA 98004  
Submitted via email: [comments@eisgatewaypacificwa.gov](mailto:comments@eisgatewaypacificwa.gov)

**RE: Proposed coal export terminal at Cherry Point**

To Whom it May Concern,

Please accept these comments on behalf of the Waterkeeper Alliance, which is an international network of water advocates with more than 200 programs spread across 21 countries on 6 continents.

Waterkeeper Alliance and our programs in the U.S. Northwest, including Lake Pend Orielle Waterkeeper, Spokane Waterkeeper, North Sound Baykeeper, Puget Soundkeeper and Columbia Riverkeeper are deeply concerned about the impacts on communities and waterways from the toxic pollution that spews from coal extraction, transport and consumption.

In addition, there are Waterkeepers in China and India who do not want new sources of cheap coal to increase their nation's reliance on this antiquated fossil fuel and impede their efforts toward more efficiency and renewable investment.

Furthermore, there are Waterkeepers throughout the Western United States that do not want their health and the health of unborn children to be compromised by mercury deposition and other airborne contaminants traveling over the Pacific from Asia.

We support the comments submitted on this project by the Waterkeeper programs listed above and incorporate their comments by reference.

We would like to highlight a few issues below to emphasize the need, and legal obligation, for this Environmental Impact Statement to analyze thoroughly the impacts of this proposal.

**Mercury pollution**

Mercury is a well-known neurotoxin that damages the kidneys and many body systems including the nervous, cardiovascular, respiratory, gastrointestinal, hematologic, immune, and reproductive systems.

A new IPEN report release in January 2013 reveals new evidence that mercury contamination regularly exceeds health advisory levels in humans and fish worldwide.<sup>1</sup>

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<sup>1</sup> <http://www.ipen.org/hgmonitoring/>

If corporations *export* coal to Asia they are causing air pollution in the western United States. Coal export from the Pacific Northwest has the *connected action of importing* poisonous air pollution that is deposited into our streams and rivers, toxifying our fish and threatening the health, vitality and brain development of our children.

Russ Schnell of the National Oceanic and Atmospheric Administration said in 2008 that, “The ozone on the West Coast in a few years will be controlled not by California and Oregon. It will be controlled by China.”

Bruce Hope, a toxicologist for Oregon’s Department of Environmental Quality said that Oregon can do little to reduce contamination of the Willamette River because cracking down on emissions, eliminating mercury from products and segregating waste would probably not be enough to allow us to eat Willamette River fish because of foreign sources of mercury.

Richard Scheffe, senior science advisor with the U.S. EPA said that, “Our best estimates indicate that there’s more mercury deposited in this country from outside our borders than from inside our borders.”

While scientists are frustrated at the lack of data coming out of Asia regarding emission records, Colette Heald, a University of California at Berkeley researcher said one thing is certain, because of geography and wind, “The maximum impact from Asia is going to be in the Northwestern United States.”

This incoming pollution from coal combustion completely counteracts Washington State’s leadership in reducing greenhouse gas emissions and supporting innovative projects to protect the climate.

It is the role of our government, specifically through the National Environmental Policy Act, to disclose *all* impacts of the exploitative and profiteering shenanigans that corporations propose to force onto the people of this country and the environment that is vital to all.

Analysis of this proposal must include the impacts of imported air pollution on the West Coast of the United States from U.S. coal combustion in Asia.

### **Economics**

Energy companies that stand to make obscene profits from exporting Powder River Basin coal to China understandably want to limit the analysis of this proposal by narrowly defining the parameters of the project. While that may make sense for those wanting to squeeze as much wealth as they can from a dwindling and murderous resource, such narrow analysis is an example of what economists call the “tragedy of the commons,” which is a perilous and widely recognized economic problem.

Dr. Michael Power wrote that U.S. coal exports would relax coal supply constraints in China and effectively encourage higher levels of greenhouse gas emissions with accompanying climate change implications.

We are connected in a global community and we have a shared resource called the atmosphere.

Project analysis must include all of the externalized costs of coal development, including health impacts and the worsening harm to our climate from increased coal consumption.

### **Climate change**

The consequences of human induced climate change are mind-boggling: a rising sea that will inundate coastal areas like New York and Atlantic City, droughts that make the Dust Bowl seem easy, and the collapse of ecosystems that are vital to human life. It is happening before our eyes: An area of Arctic sea ice bigger than the United States melted in 2012.

Sadly, the world is failing to put the global energy system onto a more sustainable path.

Companies behind the Cherry Point proposal are adamant that the analysis not include the impacts of coal extraction in Wyoming and Montana, the climate impacts of increased coal combustion in China or the mercury pollution floating back to the United States. If not here and now, when will those climate changing actions be analyzed?

Delaying action is a false economy, and a dangerous path. Accordingly, the scope of the environmental impact state should:

- Analyze impacts to every community impacted by the mining, transport and burning of coal, including impacts in Montana, Idaho, Washington, India, China and Bangladesh.
- Quantify the air, land and water pollution from coal dust that will blow off rail cars, barges, transfer stations and loading areas contaminating communities, people, wildlife and waterways with heavy metals and particulates.
- Thoroughly assess the impacts of habitat alteration and pollutant impacts to natural resources, parks and wildlife including the rare, threatened and endangered species in the Columbia River Basin, the Puget Sound Basin and in the Cherry Point Aquatic Reserve where the terminal might be built, including impacts to threatened Puget Sound Chinook Salmon, steelhead trout and bull trout as well as endangered Southern Resident Orca Whales.
- Calculate and report the amount of mercury, fine particulates and other air pollutants that will blow back across the Pacific Ocean and pollute Pacific Northwest after the coal has been burned in power plants in India and China.
- Analyze the impacts to cultural and archaeological resources in tribal communities that are located in the path of the coal trains, barges and ships that will supply the Gateway Pacific Terminal.
- Assess the likely drop in property values due to air emissions, coal dust and traffic disruption along railroad path.
- Fully assess the increased risk of a marine accident that could result in a major oil spill in the already-crowded waters of Puget Sound and the Salish Sea, due to 900 or more container ship transits per year. This should include a major spill's

likely impact on the economy and on threatened and endangered species, including the endangered Southern Resident orca whale.

- Quantify the carbon emissions generated by the burning and transport of the coal, as well as its impact on global climate change and ocean acidification.
- Include a no-action alternative.

We urge state and federal agencies to recognize this undeniable truth and conduct a proper environmental impact analysis that fully quantifies these global impacts.

Sincerely,

Pete Nichols  
National Director  
Waterkeeper Alliance