

960 5<sup>th</sup> Avenue South, #203  
Edmonds, Washington 98020-4037

December 4, 2012

GPT/BNSF Custer Spur  
EIS Co-Lead Agencies  
c/o CH2M Hill  
1100 112<sup>th</sup> Avenue NE  
Suite 400  
Bellevue, Washington 98004

Subject: Proposed Coal Terminals-Transportation  
Docket Number COE-2012-0016

Gentlemen,

I respectfully urge you to adopt a comprehensive programmatic environmental impact statement to analyze the cumulative consequences of all proposed terminals. The future of the ports of Seattle and Tacoma, vital gateways for high-value containers, exports of agriculture products, deliveries of aerospace components, and high-speed passenger rail traffic may all be thwarted by a large volume of low-value coal trains. A comprehensive review must include:

- a. Capacity constraints
- b. Threats to critical industries—aerospace and agriculture
- c. Threats to passenger rail traffic—commuter and interurban
- d. 30 miles of additional trains daily
- e. Need costly upgrades to accommodate proposed usage (overpasses, underpasses)
  - i. Who pays?
  - ii. Physical, economic disruptions during upgrades
- f. Derailments
- g. Impact of heavily laden trains and increased frequency of landslides

Sincerely,

A handwritten signature in black ink, appearing to be "B. J. [unclear]", written in a cursive style.

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1100 112<sup>th</sup> Avenue NE  
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Subject: Proposed Coal Terminals-Environment  
Docket Number COE-2012-0016

Gentlemen,

I respectfully urge you to adopt a comprehensive programmatic environmental impact statement to analyze the cumulative consequences of all proposed terminals. Coal is damaging to our environment. The Northwest is a region noted for its spectacular physical beauty and a dedication to clean, healthy living and environmental stewardship. A comprehensive review must include:

- a. Devastation at mine site
- b. Acidic wastewater from 80-105 acres of open coal heaps at terminal, in close proximity to Cherry Point Aquatic Reserve, harmful to marine flora, fauna
- c. High winds distribute coal dust to marine plants, animals
- d. Toxic arsenic, mercury into soil, water along 1500 mile route from mine and across the expanse of Washington
- e. Wastewater contains high concentrations Copper, Iron, Aluminum, Nickel
- f. Construction of facility and miles of rail loops on wetlands and uplands, and 2,980-foot wharf to berth 3 ships and 1,250-foot trestle over water may disrupt fragile ecosystems
- g. Cherry Point herring, a keystone species, status already fragile, likely further stressed by terminal activities
- h. Degraded marine environment pose challenges to orcas, salmon, shorebirds, and migratory birds
- i. Discharged ballast water may likely introduce invasive species with potentially disastrous consequences
- j. Marine traffic
  - i. Strait of Georgia currently crowded with oil tankers
  - ii. Additional 900 annual transits by Panamax and Capesize (too large to transit Panama Canal) ships.
  - iii. Spill of coal and, or oil would devastate marine life, shorelines, and state's economy Note: Washington's oil response spill program faces budget cuts.
- k. Global climate change (disruption)
  - i. Coal combustion in China poses serious health risk to hundreds of millions of people, especially children
  - ii. Negative impacts transcend geographic borders
  - iii. Ocean acidification, acid rain, mercury emissions
  - iv. Intensified climatic events

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Subject: Proposed Coal Terminals-Public Health  
Docket Number COE-2012-0016

Gentlemen,

I respectfully urge you to adopt a comprehensive programmatic environmental impact statement to analyze the cumulative consequences of all proposed terminals. Coal is damaging to human life. Every step of the coal-fired process is dangerous to human health, from mining and processing to transporting to burning and waste. Those most often impacted by these dangerous processes are the most vulnerable: the poor, the elderly, and especially children. A comprehensive review must include:

- a. Coal dust—500-2,000 pounds lost from each coal car enroute (up to 300,000 pounds each 150-car coal train)
  - i. Life expectancy
  - ii. Infant mortality
  - iii. Asthma
  - iv. Pneumonia
  - v. Emphysema
  - vi. Heart disease
  - vii. Decreases visibility for drivers near railroad tracks
  - viii. Threatens crops and drinking water
  - ix. Financial responsibility uncertain as to which party pays for coal dust mitigation measures
- b. Diesel emissions
- c. Emergency response time delays
- d. Noise exposure
- e. Grade crossing collisions
- f. Surfactants—threaten human health
  - i. Purpose—contain dust
  - ii. Effectiveness in wind, rain unknown
  - iii. Costly to apply
  - iv. Clogs ballast, reduces friction, decreases track stability, contributes to derailments
- g. Coal fly ash
- h. Coal fly ash slurry

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Subject: Proposed Coal Terminals-Scale of Proposed Terminals  
Docket Number COE-2012-0016

Gentlemen,

I respectfully urge you to adopt a comprehensive programmatic environmental impact statement to analyze the cumulative consequences of all proposed terminals. The unprecedented proposed capacity of the several terminals warrants a comprehensive review to consider the risk of abandoned terminals with resulting environmental degradation and costly remediation burdens for local taxpayers. A comprehensive review must include:

- a. Stated capacity of six proposed Northwest terminals is more than 150 million metric tonnes annually
- b. Permit application allows increase in export volume and increase in number of trains each day
- c. 150 million metric tonnes exceeds U. S. record coal export of 102 metric tonnes set in 1981

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Subject: Proposed Coal Terminals-Global Consequences  
Docket Number COE-2012-0016

Gentlemen,

I respectfully urge you to adopt a comprehensive programmatic environmental impact statement to analyze the cumulative consequences of all proposed terminals. A responsible analysis must include the undeniable consequences of carbon emissions. A comprehensive review must include:

- a. Coal is dirtiest of fossil fuels
- b. Coal combustion contributes up to 80% of global warming pollution
- c. Earth's atmosphere reaching tipping point
- d. NASA's James Hansen: "If humanity wishes to preserve a planet similar to that on which civilization developed and to which life on Earth is adapted, paleoclimate evidence and ongoing climate change suggest that CO<sub>2</sub> will need to be reduced from its current 385 ppm to at most 350 ppm."
- e. Gregg H Marland, Ph.D., Oak Ridge National Laboratory, 35 years; Member, Intergovernmental Panel on Climate Change (IPCC) "If we're going to run the world on coal, we're in deep trouble."

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Subject: Proposed Coal Terminals-Solidarity with Native Americans  
Docket Number COE-2012-0016

Gentlemen,

I respectfully urge you to adopt a comprehensive programmatic environmental impact statement to analyze the cumulative consequences of all proposed terminals. A comprehensive review must include recognition that the Lummi Nation contends that President Grant illegally reduced the size of their original reservation land by taking the Cherry Point site for benefit of non-Indian settlers

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Subject: Proposed Coal Terminals-Economic  
Docket Number COE-2012-0016

Gentlemen,

I respectfully urge you to adopt a comprehensive programmatic environmental impact statement to analyze the cumulative consequences of all proposed terminals. The envied, vibrant economy of the Northwest and its long-term growth prospects may be jeopardized for short-term quarterly gains for a few large corporations headquartered elsewhere and a very few low-tech jobs. A comprehensive review must include:

- a. Jobs
  - i. Few permanent terminal jobs vs. 5,600 jobs redeveloped former Georgia-Pacific Bellingham waterfront site
  - ii. Fisheries
  - iii. Tourism
  - iv. Threatens in-migration of skilled workers, entrepreneurs
- b. 125 to 150-car coal trains block access to businesses, parks, marinas, beaches, ferries
- c. Impact on property values
- d. Impact on municipalities of reduced assessed values and tax receipts
- e. Taxpayer investment required for railroad crossings, erosion management, environmental mitigation at a time when public budgets face historic pressures
- f. China
  - i. Has coal (50% of world's production)
  - ii. Current high Asian coal prices
  - iii. Strategic adjustments in China
    1. Goal-Reduce carbon emissions 45%
    2. Building rail lines
  - iv. Australia, Indonesia have coal 1000 miles closer