

Friday January 18, 2013  
Bellingham, WA.

My name is John Turnbaugh. I reside at 3108 Crestline Drive in Bellingham and have been a Bellingham resident since 2001. From 2001 to 2010 I worked at the BP Cherry Point Refinery as a Chemical Engineer retiring in 2010,

As a resident I share with others the concerns of the Gateway Pacific Terminal project's impact on the community, its surrounding environment and overall "livability". I also question the necessity of such a terminal when there are existing sites such as Longview, WA that could be expanded and beyond that I fail to understand why multiple sites are being proposed for a terminal. However the following comments refer solely to Bellingham and Whatcom county.

I am writing to request the following item be examined in the EIS required to permit the GPT:

### **Impact 1.**

Using an average number days of closure over the past 15 years, what is the impact of railroad blockage between Seattle and the proposed terminal?

**Significance;** In this event all rail traffic will be blocked south of Bellingham. Are there adequate facilities available to "park" trains waiting for track clearance or will construction of additional rail sidings be required? If construction is required where will it be and what will be the disruptions on communities around the construction site. Further, once traffic resumes will there be an increase in train traffic to the GPT until backlog of traffic is mitigated? What is the impact of this event in Bellingham and communities along the track right-of-way?; Will it necessitate a new rail siding in Bellingham to accommodate even temporary increases in traffic while any backlog is worked off? If so where will it be located? Will it require a permit? What is its environmental impact?

**Foreseeable;** This impact is foreseeable since there are routinely mud and rock slides during the fall, winter and spring that disrupts rail traffic several days at a time. Increased vibration resulting from increased rail traffic will adversely impact soil stability increasing the number of disruptions.

### **Alternatives;**

- 1 Deny the permit
- 2 Ignore this impact
- 3 Address how this situation will be handled/mitigated in the EIS
- 4 Halt rail traffic at the source until any blockage is cleared. This eliminates any "spike" in traffic and the need to increase the initial scope of work.
- 5 If work continues around the clock at the source incremental staging for trains is required somewhere. even if it is at the point of origin any impact

### **Impact 2.**

Consider rail traffic beyond the current proposed scope.

**Significance;** To permit a terminal for "x" capacity is a slippery slope

- It has been postulated that the terminal may expand to export grain.
- There are current projects at Anacortes and Blaine refineries to import landlocked N. Dak. crude oil

- Increased freight will inevitably impact passenger trains

Any of these events disrupts communities along the rail right-of-way, increases vibration impact on soil stability and increases noise and dust pollution. Most importantly not including future traffic masks the true magnitude of the ultimate impact from the affected communities.

**Foreseeable:** Completely foreseeable since the claim is made that a future use of the facility could be as a grain exporter, rail offloading facilities are under construction or in the permit stage at refineries and passenger traffic is already impacted by current freight traffic.

This is an important point since once a facility exists the argument that it is a “sunk cost” and expansion requiring the incremental cost of facilities is normally more economical than a new facility at a separate location. However, noise impact, dust pollution, the impact of vibration on soil stability and local traffic disruptions and impacts can increase substantially as a result of the incremental investment.

**Alternatives:**

- 1 Deny the permit
- 2 Do nothing
- 3 Require the permit be “cradle to grave”
- 4 Require estimation of “tipping points”, i.e. the point at which traffic will require additional rail facilities such as parallel track and new rail sidings
- 5 Require geological surveys to determine sub-soil stability and the impact of increased vibration

While it may be impossible to know or predict the ultimate usage of the existing rail the existing track capacity is calculable. Rather than speculate the public should know and the erector and railroad should provide an estimate of current capacity, at what point that capacity will be exceeded and where any siding and associated facilities would be located. This could be presented as “tipping points” for incremental rail capacity/investment.

**Impact 3.**

Consider the impact on herring spawning areas and marine life in general

**Significance:** Certain areas near the proposed facility are already closed to marine barge off-loading approximately half the year. If the proposed facility goes forward there will be year round impact on sensitive marine areas. This impact results from two sources, water runoff from the facility itself and ballast discharge from ship traffic:

- In 2005 the lower British Columbia/Northwest Washington Orca was placed on the Endangered Species list. This species will be further threatened by traffic, underwater noise and the traffic impact on prey
- The local herring population is currently in decline, although not on the Endangered Species list the species is constantly threatened

**Foreseeable:** This is not only foreseeable but inevitable

**Alternatives:**

- 1 Ignore the impact and do nothing
- 2 Deny the permit
- 3 Allow ship traffic only when herring are not spawning

- 4 Require zero water discharge from both the facility and ships

**Impact 4.**

Include diesel and ship emissions during “idling”

**Significance:** Air and water pollution not measured in a “particulates per mile” or emissions considered only during transit. This is a particular concern if marine diesel is not “low sulfur”, i.e. <15 ppm

**Foreseeable:** Lighting, heating and other amenities are required even when trains & ships are not in transit so this is completely foreseeable.

**Alternatives:**

- 1 Do nothing
- 2 Deny the permit
- 3 Required any ship or train at the facility to be powered from the site and not by engine power.
- 4 Require any ship to burn <15 ppm diesel
- 5 Require ships have “zero water” discharge