

I request that when evaluating the impacts of the proposed coal terminal, the agencies should apply the Camel's Nose effect to understand the likely magnitude of the impacts.

The expression goes, that once you let the camel put its nose into your tent, it will put more and more of itself in, and pretty soon you have an entire camel in your tent with no way to get rid of it. The solution is: Never let a camel put its nose in your tent.

The applicability of this to the proposed terminal is that, during the permitting process, all of the operating facilities of the terminal will be even better than shiny and new – they will have no flaws because they do not exist yet. The entire permit evaluation will be done during this condition.

Once permits are issued, and things start to go wrong, the likely area of potential response by the agencies is limited. The agencies could issue citations, or require band aids to reduce the harm from the newly discovered flaw in the operation. Such partial actions will not stop the degradation of the environment.

It is broadly true that the discovery of ugly truths about the actual operation of the facility will not result in it being shut down. That's because the camel's nose is in the tent – so much money has been spent at this point that it will be widely perceived that the facility has a "right" to operate, even if the information provided in the permit applications does not match reality once built.

For that reason, at any place in the permit application where the applicant states that an impact will be minimized due to "new technology" or "state of the art" controls, the applicant should prove the truth of such statements. For instance, the applicant should be able to point to at least one other facility, already operating somewhere in the world, where similar processes are resulting in 100% containment of all pollutants.

The requirement to contain 100% of all materials is particularly serious for a coal terminal handling 48 million metric tons of material per year. A loss rate of 0.01 percent, stunningly low in percent terms, resolves to annual losses of 4,800 metric tons of coal per year, whether into the marine environment, into the air, or to the land environment.

It is a known condition that, as observed to date in the world, the marine environment near any coal terminal has inevitably died. We know this, for example, from experience with coal terminals such as the one at nearby Point Roberts, at the location of what was once a thriving herring hatchery, but where there now are no herring at all.

I submit that it is upon the applicant to prove, not by papers and diagrams, but by actual example somewhere in the world, that their design will result in zero losses of coal or any other material into the environment.

Additionally, if the applicant submits estimates of losses to the environment, and if those estimates are used as the basis for permitting, then the applicant should agree that, if actual losses exceed those estimated, then the facility will immediately cease operations until a sufficient redesign and rebuild has been accomplished to eliminate the excess losses.

If this level of diligence is not exercised, then the sad truth is that, after the facility has been operating for a few years, and the nearby sea has begun to die, the widespread reaction will be: "What else did you expect? Of course it's dead. It's near a coal terminal."

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