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GPT/BNSF Custer Spur EIS Co-Lead Agencies  
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Re: Proposed Gateway Pacific terminal/Custer Spur EIS

Please accept my comments to be considered in the draft Environmental Impact Statement that will analyze the proposed Gateway Pacific commodity export terminal at Cherry Point, WA. I have some concerns about the project which should be analyzed in the EIS, including adverse impacts on air quality and water quality affecting human health, traffic, and climate change.

Air Quality: The EIS should quantify the amounts and analyze the effects of airborne fugitive coal dust from terminal operations, uncovered stockpiles at the terminal, and from the uncovered coal cars of the trains that would pass through all the cities and towns on the Burlington Northern Santa Fe Railroad (BNSF). Coal contains poisonous metallic and semi-metallic elements such as mercury and arsenic, and trace radioactive elements, which are known to be hazardous to human health. Diesel exhaust from locomotives is carcinogenic, and can cause cardiovascular disease. The EIS should quantify the effects on human health, such as additional lung and heart disease cases. The increased number of train trips will certainly cause more air pollution, including small particulates which can lodge in the lungs, with an expected increase in long term adverse health effects to people who live and work close to the main rail lines and spurs. Also, as has been shown by operations of the coal terminal in Tsawwassen, British Columbia, large quantities of coal dust can blow off of the stockpiles on windy days, making the air unhealthy to breathe, and reducing visibility.

Mitigation measures to protect air quality and human health should include:

1. Wetting down the stockpiles with a dust palliative or surfactant during unloading/loading operations, especially on dry days.
2. Covering the railroad coal cars completely with automatic roll tarps (similar to what gravel trucks use) to prevent fugitive dust from escaping, because while in transport the coal will shift and abrade, releasing dust.
3. The diesel train locomotives should burn bio-diesel fuel and/or be retrofitted with clean diesel technology to reduce emissions.

Water Quality: The EIS should examine effects of coal terminal operations on water quality, including ground water, and storm water runoff. The EIS should analyze the transport and transfer of coal from the trains to ships at the terminal to determine the effects of spilling coal and fugitive coal dust entering the saltwater and marine environment of the Strait of Georgia.

Mitigation measures to protect water quality should include:

1. Buffering the stockpiles and facilities with vegetation and retention ponds to prevent the transport of coal-silt contaminated water, and water contaminated from fuel, lubricants, and hydraulic fluid from machinery and rail operations.
2. Wetting down the stockpiles as stated above.
3. Implement a plan and mechanisms to prevent coal from being accidentally dumped into the saltwater, and how spilled coal would be recovered.

Traffic: The proposal states that there would likely be an additional 16 train trips on the BNSF main line to and from the Gateway Pacific terminal, but this figure is potentially erroneous. The EIS should consider cumulative impacts of a potential increase in the number of round trip train trips, if the proposed Tongue River Railroad spur is approved to service new coal strip mines planned by Arch Coal in southeastern Montana. The EIS will need to consider the traffic impacts of major arterials that cross the BNSF tracks at grade. All the major cities and towns along the BNSF corridor in Washington will experience more traffic delays from the long coal trains. Not only would this be an inconvenience to people due to additional time lost and fuel consumed waiting at crossings, but the increased train traffic can potentially delay emergency vehicles.

Mitigation measures to reduce traffic delays should be considered:

1. Require BNSF to upgrade at-grade crossings of major arterials (construct bridges or underpasses), with BNSF paying the majority of the cost, not municipalities or federal taxpayers.
2. Upgrade the tracks and warning signals through congested areas so the trains can pass safely at a higher rate of speed.
3. Require the trains to haul a fewer number of coal cars.

Climate Change: The EIS should include an analysis of the indirect and cumulative impacts of the project on climate change. All of the coal that will be shipped out of the proposed terminals at Cherry Point and Longview will be burned in coal-fired power plants in Asia, contributing to greenhouse gas emissions and global warming. Based on the estimated tonnage of coal to be exported annually from the proposed Washington terminals, a corresponding amount of carbon dioxide emitted from burning the coal can be calculated. It would not be credible to state that Asian countries would simply buy the coal from somewhere else. That may be true, but the U.S. has the largest amount of coal reserves in the world. Also, the U.S. share of emissions from domestic coal-fired power plants has actually dropped in recent years, as coal plants have been closed and replaced with natural gas-fired plants (which generate half the emissions and none of the toxic particulates). However, the decline in U.S. emissions are being swamped by the growth in the use of coal by Asian countries.

In my opinion the additional jobs that would be generated from the proposed Gateway Pacific terminal would not be a fair trade for potential adverse affects to public health and safety that the community hosting the terminal, and all the communities along the BNSF railroad, will have to bear. I also believe that selling the Asian countries coal, which I realize would provide jobs and help reduce our trade deficit, will also without a doubt contribute toward exacerbating the global warming trend in future years. This will have adverse consequences for all of us in the near future. If this project is approved, strict mitigation measures should be implemented and enforced to protect the environment and public health.

Thank you for considering my comments.

Sincerely,

*/s/ Eric Ozog*