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GPT/Custer Spur EIS  
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SUBJECT: Comment, Gateway Pacific Terminals EIS  
Impact on Recovery, Restoration, and Conservation Programs

### The Washington Outdoor Recreation Industry

According to the Outdoor Industry Association's 2006 report,<sup>1</sup> that sector contributes \$11.7 billion per year to Washington's economy, including:

- 115,000 jobs
- \$650 million in tax revenues
- \$8.5 billion in retail sales and services

On June 9-12, 2012, the Western Governors' Association (WGA) held its annual meeting at The Lodge at Suncadia, Cle Elum, Washington. Gov. Chris Gregoire, chair of the WGA, themed this year's meeting using her "Get Out West" initiative. The governor invited her peers to "discuss strategies for growing the West's tourism and recreation industries that will help our states create jobs and enhance economic opportunities across the region; connecting young people and their families to our great outdoor places; and harnessing domestic energy resources."

According to the initiative, our "lands and waterways drive our local economies, define our culture and enrich our quality of life." Its goal is to "generate jobs and draw attention to the importance of effective **conservation strategies** so these assets are available for future generations [emphasis added]."<sup>2</sup>

### Conservation Programs

Washington's State Conservation Commission (SCC) is the second oldest commission in the state, having been established in 1939. It oversees a state agency and 45 municipal corporations which, with the assistance of 235 volunteers, "supports and guides the conservation districts as important, non-regulatory resources of information, guidance, and technical services for private land owners and managers in dealing with land, water, and air quality conservation."<sup>3</sup> According to the SCC, its role and that of the conservation districts,

which have no regulatory function, is to educate land owners, managers, and other stakeholders about the value and need for natural resource conservation, to effectively and efficiently deliver conservation programs through voluntary compliance, a minimum of

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<sup>1</sup> "The Active Outdoor Recreation Economy, A \$730 Billion Contribution to the U.S. Economy – Washington," <http://www.outdoorindustry.org/pdf/WashingtonRecEconomy.pdf>.

<sup>2</sup> <http://leg.mt.gov/content/Committees/Interim/2011-2012/EQC/Meeting-Documents/January-2012/get-out-west.pdf>.

<sup>3</sup> <http://www.scc.wa.gov/about-the-commission/>.

bureaucracy, and accountability for results. [Their] approach is to facilitate and encourage dialog between land owners, land managers, local stakeholders, and state and federal agencies on critical natural resource conservation issues and on the means for their resolution. In addition, [they] implement essential conservation practices expertly and efficiently and at minimum cost to the State and other supporting agencies.<sup>4</sup>

### What Conservation Costs the State and Federal Governments

The SCC requested approximately \$44 million in state funds for the 2013-15 biennium, a 232.7 percent increase over the previous biennium because it has asked for a restoration of funds previously cut, along with new money for specific projects. One of the new projects would be the Voluntary Stewardship Program which creates incentive-based programs for landowners, such as farmers, to protect natural resources on their properties.

The total allocation in the current biennium for all Washington State natural resource agencies, including the Conservation Commission, Department of Ecology, Department of Natural Resources and others, amounts to about \$350 million. In addition, the current biennium budget for the Washington Department of Fish and Wildlife is \$358.5 million.

### Salmon Recovery

Since 1990, the Washington Department of Fish and Wildlife, at the direction of the state legislature, has administered the Regional Fisheries Enhancement Group (RFEG) Program to involve citizens in salmon recover. Today, 14 RFEGs share a common goal of restoring salmonid populations and habitat by creating partnerships with local, state, and federal agencies; tribes; and citizens.

As a separate measure, the Washington State Legislature created the Salmon Recovery Funding Board in 1999 to provide grants to protect or restore salmon habitat and assist with related activities.<sup>5</sup>

The board funds projects that protect existing, high quality habitats for salmon, and that restore degraded habitat to increase overall habitat health and biological productivity. The board also awards grants for feasibility assessments to determine future projects and for other salmon related activities.

Projects may include the actual habitat used by salmon and the land and water that support ecosystem functions and processes important to salmon.

Additionally, Congress established the Pacific Coastal Salmon Recovery Fund (PCSRF) as one component of many activities and projects to recover Pacific salmon and steelhead listed under the Endangered Species Act. The PCSRF's goal is to facilitate restoration and conservation of Pacific salmon and steelhead populations and their habitat. Each year since FY 2000, Congress has appropriated funds to the states of Washington, Oregon, California, Idaho, and Alaska, as well as the Pacific Coastal and Columbia River tribes ("grantees"), to be used by soil and water conservation districts, local governments, tribes, state agencies, public partners, and watershed councils.

### Funding for Salmon Recovery

According to the Washington Department of Fish and Wildlife, "Partial funding for the RFEG program comes from a portion of commercial and recreational fishing license fees, administered by the WDFW. The RFEGs also obtain many individual grants from government and private entities. Individual donations and in-

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<sup>4</sup> *Id.*

<sup>5</sup> <http://www.rco.wa.gov/boards/srfb.shtml>.

kind contributions from local community members and businesses are also essential to the success of each RFEG.”<sup>6</sup>

PCSRF monies are used to leverage additional funds from state and local entities, and volunteer participation from local and private sources. Washington’s funds come from the sale of state general obligation bonds. From 2000-2010, Washington received \$287.3 million in federal grants for Salmon and steelhead recovery.<sup>7</sup>

### The GPT EIS

When the EIS for GPT considers environmental impacts, it must go further and determine two things. First, given the billions of dollars of sunk costs in the state’s conservation programs over the past 73 years, and federal and state Salmon and steelhead recovery over the past 12 years, not to mention the millions of man hours invested, what proportion of the benefit of those programs would be lost by the environmental degradation resulting from GPT and its related activities, including rail and vessel traffic. Second, given the voluntary nature of SCC programs, how would the enormous environmental impacts of a coal terminal impede recruitment and cooperation of farmers and other private property owners to engage them in reducing their relatively small environmental impacts on the state’s waterways?

### Need for a Regional Cumulative EIS

The state’s waters and fish will be impacted by rail activities related to GPT’s terminal operation from the Columbia River Gorge, up the coast, to the terminal. In the Gorge, the rail impacts will be cumulative with existing traffic and that which would be added if any or all of the three proposed terminals on the Columbia River were permitted. Given the central role of the Columbia River in conservation and Salmon recovery programs, a cumulative impact assessment is particularly warranted. The combination of diesel particulates and fugitive coal dust from rail, ships, barges, tugs, and coal storage must be considered.

Further, Washington is not the only state impacted by the proposed coal terminals, nor the only state which has invested huge sums in conservation and recovery programs. Alaska faces the potential risk of a spill in the Aleutians if a collision, allusion, or grounding occurs due to increased vessel traffic in the Great Circle Route. Montana could experience 50 additional trains per day on their coal rail corridors with all the impacts that entails. Both are states that have invested heavily in their outdoor recreation industries and those industries would be negatively impacted, if not devastated, by a significant event or persistent cumulative impacts related to exporting coal from the West Coast.

### Conclusion

The Alliance for Northwest Jobs and Exports, the lobbying group for the five terminal proponents, mining operators, and rail companies, touts the tax contribution of the terminals to local and state economies, citing variously sums up to \$15 million per year, but even a combined \$75 million tax contribution is a pittance compared to the sums being invested in impacted states on recovery and conservation of habitats that support outdoor recreation and fishing industries. The GPT EIS – and those for the other four terminals – must do more than identify environmental impacts of the proposals. The EIS’s must consider the real possibility of a catastrophic event such as the spilling of bunker fuel and coal into waters used by Salmon, steelhead, and other fish, as well as the day-to-day long-term effects of the pollution, churning of riverbeds and sea floors, etc., of all activities related to GPT and other proposed terminals including rail, vessels, and coal storage and loading/unloading. Then the EIS’s must calculate – as a public expense – the amount of funds governments

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<sup>6</sup> <http://wdfw.wa.gov/about/volunteer/rfeg/>.

<sup>7</sup> 2011 Report to Congress, Pacific Coastal Salmon Recovery Fund, U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, <http://www.nwr.noaa.gov/Salmon-Recovery-Planning/PCSRF/upload/PCSRF-Rpt-2011.pdf>.

would expend for cleanup and recovery. Further, though, that cost must include the lost prior investments in recovery and conservation if those efforts are negated, in whole or in part, due to permitting coal terminals. Finally, the EIS must determine at what point the government loses some or all credibility in its conservation efforts because further investments in time and resources is futile or perceived to be so.

Respectfully submitted,

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