State of
Washington
House of
Representatives

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Tyler Schroeder
Whatcom County Planning and Development Services
5280 Northwest Drive
Bellingham, Washington 98226

GPT/Custer Spur EIS
c/o CH2M HILL,
1100 112th Avenue NE Suite 400
Bellevue, WA 98004

RE: Scoping Comments on Gateway Pacific Terminal/Custer Spur EIS

Dear Mr. Schroeder,

We greatly appreciate the opportunity to participate in the environmental review process for the proposed Gateway Pacific Terminal (GPT) project. Please consider this letter as part of the public record for the Gateway Pacific Terminal coal export project proposed at Cherry Point, Whatcom County, Washington, facility site ID #22237.

The purpose of this letter is to urge the co-lead agencies to thoroughly examine the GPT project's impact to the natural environment, as well as the project's impacts to Washington's built environment. We are particularly interested in ensuring that this review process accurately identifies and assesses the full range of potential externalities and impacts, not just in the area immediately surrounding the project site, but statewide in a comprehensive and cumulative fashion.

Due to the gravity of the proposed project and the widespread nature of the potential impacts, we recommend that the agencies broaden the scope of the review process to include the impacts felt by cities and counties across Washington. We also encourage the agencies to consider the cumulative impact of the GPT project in light of similar coal export proposals elsewhere in the Pacific Northwest. Only through a thorough and comprehensive review process can stakeholders understand the full scope of the GPT project and the impacts it will have. This letter

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summarizes some of the far-reaching effects of the GPT project that should be, at a minimum, analyzed within the scope of the environmental impact statement.

I.   Impacts to the Built Environment

Some of the most significant impacts of the proposed GPT project may be felt by Washington's built environment. The transportation infrastructure – rail, road, and marine – is likely to be affected by the GPT project, as are the commercial centers located adjacent to transportation corridors. We urge the agencies to include in their review the following impacts to Washington's built environment.

A. Traffic Congestion at Rail Crossings

The GPT project will significantly increase rail traffic along Washington rail lines, and the effect of increased traffic on rail crossings warrants examination by the agencies. Independent studies suggest that GPT rail traffic will cause the closure of rail crossings for up to seven minutes at a time in some instances, in consolidated schedules (for example during rush hour or during professional sporting events in downtown Seattle), and the impacts of these additional crossing closures must be incorporated in the examination of economic externalities.

First, the agencies must look at whether additional crossing closures will impact levels of service, including those relating to emergency response times. If levels of service are affected, the agencies should examine options for mitigation and how they might be employed, as well as who would bear the cost of mitigation.

The agencies should also look at how additional rail traffic might impact non-rail freight mobility and access to local businesses. The GPT project would likely increase the number of trains traveling near a number of Washington's largest ports, tourist centers, and economic hubs, and the agencies should look at the effects of rail crossing delays on the movement of goods and people in these areas. One specific example is the prospect of numerous trains in short time spans along the Seattle waterfront impacting the ferry system, cruise ship terminals, tourist access to Pike Place Market and the Seattle Center. This type of economic externality goes to the core of an accurate assessment of the incremental impact of the proposal, and the vital role this public process plays.

B. Impacts to Existing Freight Cargo and Passenger Rail

The transport of coal to the GPT facility would roughly double the tonnage of freight being transported by rail in Washington, and the agencies should thoroughly examine the impact this quantitative increase will have on local industries. Specifically, the agencies should evaluate the impact coal train traffic will have on the cost and ease of transporting goods within the state (agricultural and aerospace products, for example), and the relative difference between the pricing and impacts to short- and long-haul shipments.

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In addition to the impacts to local industry, the agencies should examine the impact that added freight rail traffic will have on passenger rail service. The agencies should determine what effect, if any, GPT-induced rail traffic will have on rates, dependability, and frequency of passenger rail services like Amtrak.

C.   Impacts to Ferry System and San Juan Straits Marine Traffic

The GPT project has the potential to substantially impact the Washington State Ferries system, both in the Puget Sound where rail traffic may interfere with ferry loading and unloading, and in the San Juan Straits, where coal-transporting vessels may inhibit ferry and other existing marine traffic.

The agencies should first examine the impact that GPT-induced rail traffic will have on ferry docks throughout the Puget Sound, especially the Edmonds dock. The Edmonds-Kingston run is one of the state's busiest, transporting over 4 million passengers a year and serving as an important corridor for vehicle freight traffic. Train traffic and the associated vehicle traffic disruptions along the rail lines directly adjacent to the ferry dock have already resulted in the elimination of two daily sailings. The agencies should examine the impact of additional rail traffic on ferry docks like Edmonds, paying particular attention to the potential need for congestion mitigation measures and where funding obligations for such measures would fall.

The GPT project also has the potential to impact ferry traffic traveling across the Haro and Rosario Straits around the San Juan Islands. In addition to other ferry traffic, Washington State Ferries sail across these straits over 20,000 times per year, and the agencies should examine the effect GPT-induced vessel traffic will have on the safety, cost, and timeliness of existing ferry routes. Further, the agencies should evaluate the probability of vessel collisions, ferry or otherwise, in these straits, including a review of the available and necessary emergency and rapid response capabilities.

D. Effect on Property Value

The GPT project is likely to create a number of conditions that may adversely affect property values statewide, with particularly negative implications in certain targeted areas. The environmental review should include further analysis of all potential impacts to property value and any impacts to local governments as a result of property value changes.

Studies to date have identified a number of rail traffic impacts that may alter property values around Washington. Access and vehicular traffic issues, vibration, life safety, horn noise, pollution, and stigma and perception are all likely to impact the assessed value of property in close proximity to rail lines, and the agencies must consider the degree to which property values will be affected, the range of properties affected, and the net impact on Washington properties.

In addition to determining what property value changes might occur, the agencies should evaluate the impact these changes will have on tax revenue collected by state and local governments. This evaluation should include a calculation of the net effect the GPT project will have on tax collections at both local and state levels.

E. Net Employment Changes

The environmental review process should include a thorough analysis of the project's impact on local and regional job growth. In evaluating the jobs that may be created, the analysis should include the wage level, location, and duration of these jobs, as well as whether the existing workforce is adequately equipped to fill the new positions. The analysis should also review the economic expense at which new jobs are created, specifically the impact that the project will have on other economic development projects. The agencies should also look at the employment impacts felt elsewhere in Washington, and determine the net employment impact of the project.

In addition to employment figures, the agencies should examine the impact that employment changes will have on communities around the state (both positive and negative). Changes in tax revenues and consumer spending should be evaluated relative to both construction and operational stages.

F. Public Investment Necessary to Maintain Transportation Infrastructure

Based on existing analyses of Washington's rail infrastructure, we understand from previous WSDOT analyses that the number of trains expected to transport coal to the GPT site would force many major railways to operate at or above capacity. As a result, according to much of the analysis identified to date, many incremental upgrades are probable as a result of GPT-induced traffic, and we encourage the agencies to carefully examine where rail infrastructure improvements would be likely to occur, and what sources of funding would be used for such improvements.

Within the review of these potential rail infrastructure improvements, it is vital that the agencies consider the long-term growth in the state's infrastructure needs, and evaluate the GPT project with projected long-term, multi-industry economic growth in mind. A cumulative analysis in this regard is critical to accurately measuring the true incremental effect of this project.

Apart from potential rail improvements, the agencies should study the increased costs of rail maintenance necessitated by the additional rail traffic and by coal dust and debris. Research has shown coal to be a particularly costly commodity to transport due to the effect of coal dust on rail infrastructure, and the agencies should consider both the impact of additional rail traffic and the impact of rail traffic moving large quantities of coal. The share of increased marginal costs borne by the public at the local, regional, and state level should be noted in detail so an accurate accounting of transportation externalities can be conducted.

Also relating to public investment, the agencies should examine the cost of mitigation measures, such as additional overpasses, tunnels, crossings, and diversions, which additional rail traffic will likely motivate, especially relative to economic impacts. The location of necessary or probable mitigation projects, as well as the portion of the cost contributed by local governments, should be described to enable such entities to conduct financial analyses. Again, the need for mitigation measures should be evaluated in the context of long-term growth models that account for traditional changes in economic conditions, industry growth, and fluctuating population demographics.

G.   Impact of Market Volatility on Commerce and Infrastructure

Apart from the immediate impacts of the GPT project, we urge the agencies to analyze the longterm viability of infrastructure and mitigation investments in light of coal's market volatility and variable demand. Domestic coal consumption has declined recently, due in part to competition from other energy sources, and it seems probable that such trends will occur elsewhere.

Coal's share of energy production in China has fallen in the past year, and reports suggest that coal surpluses are accumulating as coal-burning power plants taper energy production in the face of declining energy demand. Further, the world's two largest coal exporting countries, Australia and Indonesia, lie in close proximity to Asian markets, giving them a substantial advantage in a commodity market largely driven by transportation costs.

On top of $665 million cost of constructing the GPT facility, significant public investment will be necessary to accommodate the project, and much of Washington's transportation infrastructure will have to be altered and tailored toward the export of coal. It is prudent for the agencies to analyze longterm viability of coal as a significant economic driver within the review process to effectively capture the sustained impact of the GPT project on the state's built environment.

II.   Impacts to the Natural Environment

A.   Greenhouse Gases and Emission Targets

Washington has made a public policy commitment to lower greenhouse gas emissions and move away from coal as an energy source. Part of this commitment is the consideration of climate impacts under SEPA. WAC 197-11-444 and WAC 197-11-752 establish that "climate" is one of the many environmental impacts to be reviewed under SEPA, and informal Attorney General's Office opinions clarify that "[t]aken together, the SEPA statute and rules provide that, to the extent that greenhouse gas emissions and global warming/climate change have 'specific adverse environmental impacts' or 'significant adverse impacts,' SEPA grants

authority to state and local agencies to condition or deny proposed actions based on those impacts pursuant to formally designated policies."

Given the substantial increase in greenhouse gas emissions likely to result from the GPT project and the annual export of millions of tons of coal, we urge the lead agencies to analyze the project's impacts on global climate change relative to Washington's interests. Additionally, the EIS should assess the consistency of proposed coal export projects with existing state commitments and targets, as well as reviewing the negative impacts to quality of life, public health, and the environment which are associated with climate change. This includes the impacts of climate change in our community; ocean acidification, increased likelihood of reduced snowpack, flooding, summer droughts, and forest fires risk, and quality of coastal and near-shore habitat.

B. Impacts of Air and Noise Pollution

Current studies have identified a number of concerns relating to air and noise pollution that may be generated by the GPT project. One of the many sources of pollution is coal dust that escapes from open-top rail cars. The agencies should thoroughly review the potential for coal dust to contaminate the areas along rail corridors where coal will be transported, including a review of the efficacy of various retention methods.

The agencies should also analyze the impact of additional rail traffic on air quality. Diesel particulate matter being expelled from locomotives is linked to a number of health risks, and the agencies should review the potential for increased pulmonary and cardiopulmonary health problems, increasingly severe and frequent asthma attacks, and heightened cancer rates that may occur along rail corridors as a result of pollution from GPT-induced rail traffic.

In addition to air quality, the agencies should evaluate the impacts of increased noise and vibration caused by the additional coal-hauling freight trains. Physicians' groups have associated noise pollution with cardiovascular disease, cognitive impairment in children, sleep disturbance and resultant fatigue, hypertension, arrhythmia, and increased rate of accidents and injuries, as well as the exacerbation of mental health disorders such as depression, stress and anxiety, and psychosis. The project review should include an assessment of potential impacts of this sort.

C. Impacts to Marine Environment

The GPT project is likely to impact the marine environment around Cherry Point in a number of ways, and the agencies should thoroughly review these impacts at each stage of the project. During construction, the agencies should analyze the impacts of sea-floor disturbance and increased turbidity, as well as noise from pile driving and seismic surveys. After construction, the impacts of shading from the pier and wharf, toxics from the terminal's outfall pipes, night lighting, and noise from vessel

operations should be evaluated. The agencies should examine the effects of large capacity coal storage in close proximity to the water, paying special attention to the possibility of coal dust entering the marine environment.

In addition to the impacts of the project site, the agencies should review the potential impacts of the additional 974 annual transits of giant bulk carriers necessary to serve the GPT project. The quantity of fuel carried by Panamax and Cape-size vessels, in conjunction with their poor maneuverability and the fact that they are not required to have a tug escort, necessitates the need for a thorough evaluation of vessel travel in the increasingly congested waterways of Rosario and Haro straits. The agencies should also examine safety requirements for vessels transporting coal (especially in comparison to vessels transporting other harmful commodities such as oil), and should review the need for additional emergency response resources necessary to safely accommodate additional vessels of the size proposed.

III.   Cumulative and Net Impacts

In addition to the discrete impacts list above, we strongly urge the agencies to analyze the effects of the GPT project cumulatively, in light of other coal export proposals in the Pacific Northwest. These additional projects will almost certainly have similar impacts (in type if not in extent), and the potential aggregate impacts should be analyzed in the environmental review process. The very nature of a comprehensive assessment requires a cumulative assessment that accurately identifies and analyzes the externalities of multi-site proposals.

Further, we want to emphasize the need to evaluate the broader economic impacts on a statewide scale, not solely the communities in close proximity to the proposed site. The gravity of the GPT proposal is such that the impacts, both positive and negative, will be felt in all parts of Washington. Only through a comprehensive and thorough review process can all affected parties understand and assess the scope of the project.

Thank you for your consideration,

Undersigned

Rep. Reuven Carlyle – 36th District

Rep. Joe Fitzgibbon – 34th District

Rep. Kristine Lytton – 40th District

Rep. Chris Reykdal – 22nd District

Rep. Gerry Pollet – 46th District

Rep. Ruth Kagi – 32nd District

Rep. Laurie Jinkins – 27th District

Rep. Jessyn Farrell – 46th District

Rep. Cindy Ryu – 32nd District

Rep. Gael Tarleton – 36th District

Rep. Marcie Maxwell – 41st District