

Snohomish County Tomorrow

A GROWTH MANAGEMENT ADVISORY COUNCIL



December 21, 2012

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Commander and Division Engineer
U.S. Army Corps of Engineers Northwestern Division
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Portland, OR 97208-2870

Col. John Eisenhower
Commander, Portland District
U.S. Army Corps of Engineers
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Col. Bruce Estok
Commander, Seattle District
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RE: Scoping Comments - Proposed Gateway Pacific Coal Export Terminal at Cherry Point

Dear Brig. Gen. McMahon, Col. Eisenhower, and Col. Estok:

As the cooperative and representative body for growth management policies in Snohomish County, WA, the Snohomish County Tomorrow (SCT) Steering Committee submits this letter as our scoping comments for the Gateway Pacific Terminal coal export project proposed at Cherry Point, Whatcom County, Washington, facility site ID #22237. SCT is a countywide policy organization that recognizes that the impacts of coal export at Cherry Point will extend far beyond the terminal, reaching into every community located along the rail line between the coal mines and the export terminal, and even to communities outside the state that will be affected by the climate impacts of these proposals. We respectfully request that the U.S. Army Corps of Engineers, Washington Department of Ecology, and Whatcom County (collectively "the lead agencies") fully disclose and carefully assess the impacts of the Gateway Pacific Terminal on our communities and the broader region.

Pacific International Terminals, a subsidiary of SSA Marine, proposes to export 48 million metric tons of coal annually. Depending on the specific routes that the trains may take, this coal will travel in uncovered rail cars en route to the proposed Whatcom County terminal and return trains will pass through dozens of communities, including the Snohomish County cities and towns of Woodway, Edmonds, Mukilteo, Everett, Marysville, Stanwood, Sultan, Monroe and Snohomish. Aside from the impacts of coal export at and near the terminal, the Environmental Impact Statement (EIS) must examine the impacts of coal trains and the coal export industry on the citizens, local environment, and quality of life. This includes the direct, indirect, and cumulative impacts of coal export on public health, public safety, economic, marine health, public investment, and climate change. These potential impacts are described in greater detail below.

Finally, and due to the broad scale and incremental nature in which the coal train operations are expected to develop over a number of years, we believe it is imperative that the Army Corps of Engineers conducts an area-wide Environmental Impact Statement that assesses the cumulative impacts of all five of the Northwest coal export proposals.

Public Investment and Transportation

Based on existing analyses of Washington's rail infrastructure, we understand that the number of trains expected to transport coal to the GPT site could force many major railways to operate at or above capacity. Many of our communities adjacent to the rail line currently have multiple at-grade crossings, some of which are on major arterial streets. Motor vehicle congestion resulting from at-grade crossings and rail traffic is already highly problematic at some of these locations. The congestion that may be caused by additional trains could result in significant impacts on a number of key local streets as well as state and federal highways. <http://www.coaltrainfacts.org/gibson-traffic-consultants-bellingham-wa-traffic-study>. Preliminary traffic analyses have already been done for Edmonds, Marysville and Stanwood. These studies show the potential for severe impacts in communities from the dramatic increases in traffic. The EIS should review the impacts at specific intersections and potential mitigation in more detail, and should evaluate potential impacts on other communities in Snohomish County that have not yet been reviewed.

Furthermore, the public cost to develop capital projects that would separate these at-grade crossings threatens to divert precious public transportation resources that are programmed for existing needs. As a result, according to much of the analysis identified to date, many upgrades are probable, and we encourage the agencies to carefully examine:

- Where rail infrastructure improvements would be likely to occur.
- The sources of funding of such proposed improvements.
- The incremental impact of needed rail improvements necessitated partially or entirely by the addition of GPT-bound coal trains over the life of the project's capital infrastructure needs.
- The increased costs of rail maintenance necessitated by the additional rail traffic.

- The share of these costs borne by the public at the local, regional and state level should be noted so a full accounting of transportation externalities can be accurately identified.
- The cost of mitigation measures, such as additional overpasses, tunnels, crossings, and diversions, that 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 the federal government.

Public Health

Coal is commonly transported in open-top rail cars, contaminating local air quality, infrastructure, open spaces, farms, forestland, streams and rivers with coal dust, chunks of coal, and diesel pollution. The EIS must take a hard look at the impacts coal export, including:

- The public health impacts of increased air pollution from coal dust, which contains heavy metals, including mercury, arsenic, lead and uranium. Exposure to these toxins is linked to a multitude of health problems, such as cancers and birth defects.
- The health impacts from coal dust and diesel pollution under various exposures scenarios based on different operational lifetime projections for the Gateway Pacific Terminal.
- Public health impacts from soil contaminated by coal dust and chunks of coal deposited by coal trains.
- Public health impacts from increased noise and vibration from large freight trains, which are associated with negative impacts on psychological health.
- Public health risks associated with diesel emissions and other pollutants from coal trains.
- In addressing the impacts of coal dust and diesel pollution, the EIS should specifically analyze the potential rise of respiratory problems among children, the elderly, and other vulnerable members of our communities.
- Public health impacts from increased car emissions caused by traffic delays from coal trains.
- Many of the factors listed above will also negatively affect natural ecosystems, particularly fisheries in the Columbia River and Puget Sound. These impacts should also be incorporated into your analysis.

Public Safety Impacts

The safety of residents and businesses in our communities is our highest priority. The increase in train traffic has the potential to harm our communities by leading to more frequent accidents, including train derailments and delays in emergency response times. The EIS should analyze:

- The impact of increased train traffic on the rate of vehicular accidents and the projected increase in train-related fatalities.
- The projected increase in coal train derailments due to the large increase in coal train traffic, and the emergency response capabilities to address derailments in our communities.

- The actual travel time delays at specific intersections in our communities, and the economic and environmental impacts of these delays.
- The impact of increased coal train traffic on access to emergency services, including fire, police, and EMT services.

Economic Impacts

A strong economy is vital to the well-being of our communities. Increased train traffic and port activity has the potential to slow the growth of existing businesses (particularly in the fishing, tourism, and outdoor recreation industries) and damage property, thus reducing the likelihood that new businesses will take root in our communities. The EIS should analyze:

- The impact of increased train traffic on real estate values, including safety and noise concerns.
- The potential damage that coal dust may cause to other types of property, including businesses, crops, homes, cars, and boats.
- How additional rail traffic might impact non-rail freight mobility and access to local businesses.
- The effects of rail crossing delays on the movement of goods and people given that the GPT project would likely increase the number of trains traveling near a number of Washington's largest ports, tourist centers, and economic centers.
- The net economic and employment effects of the project. The analysis should look at the jobs that will be created by the project, including 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 agencies should also look at the employment impacts felt elsewhere in Washington, and the potential for economic impacts to communities potentially affected by the rail and other impacts to determine the net employment impact of the project. This analysis should specifically look at the economic impacts on communities in Snohomish County, as well as elsewhere in the state and region.
- 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 such as Amtrak and the Sounder commuter services.
- The potential changes in property values for those properties that may be affected by their proximity to rail corridors and as a result of the proposal's noise, dust, traffic and other related impacts.

Marine Health

Exporting 48 million tons of coal as proposed requires 974 transits of giant bulk carriers every year of ships, twice the size of the oil tankers currently allowed to call on Washington ports. There is a clear need to evaluate these risks:

- Oil spills. These tankers carry up to two million gallons of bunker fuel, suffer from poor maneuverability, are not required to have tug escorts, and would join the increasingly congested waterways of Rosario and Haro straits.

- Impacts to the marine life at Cherry Point during construction of GPT. This should include sea-floor disturbance and increased turbidity, noise from pile driving and seismic surveys, and lighting – an attractive nuisance.
- Impacts during operations that need to be considered include shading from the pier and wharf, toxics from the terminal's outfall pipes, night lighting, and noise from vessel operations that could impact species at Cherry Point.
- Impacts of coal dust on the marine environment.

Climate Change

Burning coal leads to increased emissions of greenhouse gases and climate change. In turn, the EIS must assess 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 communities; ocean acidification, increased likelihood of reduced snowpack, flooding, summer droughts, and forest fires risk, and quality of coastal and near-shore habitat.

Cumulative Impacts

The lead agencies must assess the cumulative impacts of the Gateway Pacific project and existing rail traffic, as well as projected increases in rail traffic from other coal export proposals through a Programmatic EIS (PEIS). Currently, five ports are considering coal export proposals, which, together, could transport more than 140 million tons of coal through the region. For example, the lead agencies must assess the cumulative impacts resulting from the emissions of greenhouse gases that would result from the proposed combustion, mining and transportation of coal that would be handled by the proposed coal export facility at Cherry Point. In doing so, the lead agencies must assess the totality of greenhouse gas emissions associated with all of the coal export facilities that are currently proposed for the West Coast, and the lead agencies must not only consider the total emissions but also the resulting impacts to climate change and the associated impacts on human health and natural resources resulting from rising temperatures, changing climatic patterns, rising sea levels, and increasing ocean acidification.

To clarify, we are not asking you to conduct a single EIS on all of the impacts of the pending coal-export terminal proposals. Each individual project has a range of unique local effects on the environment and local communities that should be evaluated in a project-specific EIS for each site. Instead, in addition to project-specific EISs at each terminal site, we are asking you to conduct a PEIS on those environmental and economic effects of the various projects that are similar, connected or cumulative. These shared impacts include rail traffic and emissions; ocean-going vessel traffic and emissions; increased mining; national coal supply and pricing; and air-borne mercury deposition in the Northwest and GHG emissions associated with increased combustion of coal.

Alternatives Analysis

We urge the lead agencies to complete a thorough analysis of alternatives to coal export at Cherry Point, including export of other commodities, the use of the property by other industries, and a “no action” alternative.

Scoping Comments – Cherry Point

December 21, 2012

Page Six

Conclusion

The proposed coal export projects in the Northwest present unprecedented threats to our communities. We join other regions and communities located between the coal mines in the Powder River Basin and the export terminals in Oregon and Washington and urge the lead agencies to prepare an exhaustive, expansive EIS which accounts for the wide range of direct, indirect, and reasonably foreseeable impacts from coal export on our communities. We appreciate the opportunity to comment on the first EIS for coal export in the Pacific Northwest.

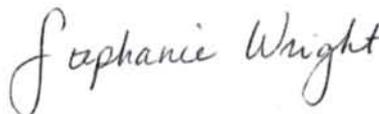
Sincerely,



Councilmember Brian Sullivan, Co-chair
SCT Steering Committee



Mayor Jon Nehring, Vice-Chair
SCT Steering Committee



Councilmember Stephanie Wright, Vice-chair
SCT Steering Committee