

**TO: Whatcom County Council, Army Corps of Engineers, and Dept. of Ecology**

**FROM:** Board of Directors of Sustainable Edmonds, c/o Richard Bisbee, 8302 188<sup>th</sup> ST SW, Edmonds, WA 98026.

We of Sustainable Edmonds, a non-profit corporation that includes residents of Edmonds, WA, present our concerns relating to the unique impacts in Edmonds that could result by transporting coal via railroad to the proposed terminal at Cherry Point in Whatcom County, WA that would be built and managed by SSA Marine to ship coal to Asia.

Edmonds is a coastal community of about 40,000 residents. The railroad line to transport coal passes through the entire south-north length of Edmonds near the shore of Puget Sound. Because of the unique environmental impacts and resulting economic impacts on Edmonds, we ask that these impacts and concerns expressed below be investigated and considered specifically in the environmental impact statement (EIS).

### **Please study the impact of EARTH Concerns in the EIS:**

The coal trains' route passes through unstable land along Puget Sound where, due to our rainfall especially in the bluff areas, erosion and landslides routinely occur, and there have been numerous in the past month. The geomorphology of the underlying soil is unstable, peat-like bog overlaid with roads and parking lots. Additionally, storm surges are predicted to worsen in intensity with rising sea level in coming years.

Seeing how one full rail car weighs 286,000 pounds, with four bigger locomotives pulling and pushing 120 rail cars 9 times and possibly 18 times more per day than what rail traffic we already have in Edmonds, would be punishing (due to increased vibrational effects) to the rail lines, the substrata beneath and numerous hillsides along the tracks. Derailments happen, as they do all over the US, every year, and could send coal and coal cars into Puget Sound.

### **Please include a study of AIR and WATER Concerns in the EIS**

Air quality would deteriorate with an increase in coal dust. Edmonds residents that live near the rail line report coal dust on and in their homes and the surrounding environment. Puget Sound experiences gusty winds at times and coal dust will definitely escape from the uncovered coal cars.

This residue will flow into Puget Sound and our special Edmonds Marsh after any rainfall. Our Edmonds Marsh is a 22.5-acre salt water estuary in an urban setting, one of the few remaining on Puget Sound that is directly east, next to the rail line. The risk of permanent damage is very real due to the delicate ecological balance within the saltwater marsh ecosystem.

**The EIS should include what the toxic constituents are within the coal dust, how much is likely to get washed into Puget Sound, where it would increase and concentrate over time, and what the impacts would be on plant and sea life.**

In addition, there would be greater amounts of particulate matter from diesel exhaust coming from the bigger locomotives and more delays in ferry traffic due to the mile and a half long trains resulting in increased vehicle idling creating additional exhaust.

**Please include a study of our NATURAL RESOURCES/Scenic Resource Concerns**

Edmonds is a small coastal city. Its quality of life and its economy depends heavily on its continued ability to enjoy its water views, beaches and marina to attract outside visitors. These would be routinely disrupted by more and longer trains passing through town.

**Please study the impact of PLANT and ANIMAL Concerns in the EIS**

The Edmonds Marsh has permanent resident birds while many other birds stop to rest and feed while on long spring and fall migrations. Some of the birds are federally protected, as the marsh itself may also be. Endangered young salmon also use the shallow waters of the marsh as nursery areas.

**Edmonds hosts an annual Birding Conference** where attendees visit the marsh during a period of bird migrations that include endangered and protected species. More than 200 species have been sighted here (both land and sea birds). The Washington Department of Fish and Wildlife (WDFW) states that birds are an indicator of environmental quality and rank the following Edmonds birds on their Priority Habitats and Species List: **Threatened Species:** Marbled Murrelet; **Sensitive Species:** Bald Eagle, Common Loon; **Candidates for Listing:** Brandt's Cormorant, Common Murre, Clark's Grebe, Western Grebe, Pileated Woodpecker, Purple Martin, Vaux's Swift and, **Monitored for Status and Distribution:** Horned Grebe, Red-necked Grebe, Great Blue Heron, Green Heron, Osprey. Increased rail traffic with its related noise would also disturb and most likely scare many birds away. And our concerns over coal dust were stated earlier. A derailment here would be the death knell for the marsh.

**Please do an in-depth study of ENVIRONMENTAL HEALTH Concerns in the EIS**

Trains are noisy, which includes the blowing of horns day and night as they pass through town in warning at our two "at grade crossings". These coal trains would be noisier for longer periods of time and more times in a day, especially with bigger locomotives pulling and pushing the coal cars. Residents have expressed great concern about the stronger vibrations in their homes and adjacent hillsides. All of this would cause an overall decrease in the quality of life for everyone.

The release of coal dust into the environment is a very big health concern. Edmonds has many senior citizens for which coal dust would be especially detrimental to their health along

with our city's youth. An evaluation of possible human and ecological impacts caused by coal dust release (and the release of diesel exhaust) should include:

- 1) A complete list of constituents in coal (and diesel exhaust) that are potentially toxic to humans, animals (including birds, mammals, fish, shellfish, and amphibians) and plants.
- 2) The amount of dust potentially released from the trains under the following conditions (e.g. with distance from the coal fields, inclement weather, especially windy and landslides causing derailment and spillage).
- 3) The concentrations of those constituents in coal.
- 4) The concentrations of the same constituents in coal dust at varying distances from the railroad tracks.
- 5) The level of exposure for each constituent (and the added or multiplicative effect of combinations of constituents) deemed acceptable to humans and ecological receptors by the EPA and State agencies (e.g. WA State Department of Ecology).
- 6) The predicted exposure to humans and ecological receptors at varying distances from the railroad tracks.
- 7) The incremental increase in cancer risk, asthma and other health risks due to these releases, especially to children, the elderly, other sensitive human receptors (e.g. Native populations who typically consume more fish and shellfish) and ecological receptors (especially threatened and endangered species).

**Please study the impact of LAND AND SHORELINE USE - ECONOMIC AND SOCIAL IMPACT Concerns in the EIS:**

Along the Edmonds rail line there are recreational areas that include three beaches, an underwater diving park along with housing, restaurants, businesses, the Port of Edmonds and its marina. These amenities are major contributors to the Edmonds economy. People trying to gain access to these would experience increased delays to just cross the railroad tracks.

Property values for many homes would drop. Tourism would decrease and conference organizers may choose other venues from the increased and perceived congestion. These would all affect local businesses, employment and ultimately City revenues.

**Please include a study of TRANSPORTATION Concerns in the EIS**

Edmonds is the only city along this long coal train corridor that has a ferry terminal that would be blocked when trains pass through town. There would be regular delays with daily changing schedules that no one would be able to predict, causing personal and commercial delays for people commuting to and from work, recreation, tourism, local and commuter bus and train service, and the delivery of goods and services by the disruption at rail crossings.

**Please include a study of PUBLIC SERVICES AND UTILITIES Concerns in the EIS**

Edmonds has two at-grade rail crossings. In the event of a fire or medical emergency while these long trains are passing, emergency services would be critically delayed. And as stated earlier, recreational beaches, the diving park, businesses and residential areas would also experience delays in accessing.

**And finally, please include a study of the Cherry Point Aquatic Reserve, and GLOBAL WARMING/CLIMATE CHANGE in the EIS. Our planet is changing in ways that we don't understand and may be out of our control. What if? What if?**

Commissioner of Lands, Peter Goldmark, actually dedicated the Cherry Point Aquatic Reserve in 2010 for the benefit of sea life and the life of Puget Sound. It would be reprehensible to reverse what took so long to establish for the survival of its special eel grass and herring for the orcas and salmon that a new terminal and the biggest cape-sized coal carrying boats would destroy.

Lastly we believe that our planet is undergoing a climate change due to global warming. This has taken place from an increase in greenhouse gases due to human activity and other events. There is a preponderance of evidence that we feel is irrefutable and we are not here to debate this issue. Our greatest concern if this terminal is built, is that the continued burning of the dirtiest of fossil fuels will greatly pollute the atmosphere (and what is burned in Asia is blown to our northwest with many tons more of greenhouse gases that our planet cannot process to maintain the climate dynamics we have understood in the past and move us into an unknown future environmental dynamic from which there may be no turning back. We're talking about the future of all life on this planet. Rising sea levels would surely impact Edmonds and all coastal communities around Puget Sound and the world. Look at what hurricane Sandy recently did to flooding on the east coast. The glaciers are receding and the polar caps are melting. We urge you to deny a construction permit for this project.

Sincerely and with great concern of all board members of Sustainable Edmonds,

Robert Freeman, President

Todd Cloutier, Chief Operations Officer

Richard Bisbee, Chief Financial Officer

Chris Herman, Director

Janice Freeman, Director

Lance Regan, Director

Susan Paine, Director

Steve Bernheim, Director