



# U.S. GRAINS COUNCIL

December 12, 2012

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

Dear Sir:

The US Grains Council (USGC) develops export markets for U.S. barley, corn, grain, sorghum and related products. Founded in 1960, the Council is a private, non-profit corporation with nine international offices and programs in more than 50 countries. Its unique membership includes producer organizations and agribusinesses with a common interest in developing export markets.

We appreciate this opportunity to submit comments associated with the Gateway Pacific Terminal (GPT) scoping hearings.

The USGC is a strong proponent of port infrastructure investment, including the GPT project. Port infrastructure is necessary and vital to enhance exports and boost our nation's balance of trade. Increasing exports and export-related jobs can be accomplished while meeting our nation's strong environmental laws and regulations.

Both the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) require an objective and unbiased environmental review before making decisions on a permit. In light of the rhetoric surrounding the GPT project, however, we are somewhat concerned that political influence will culminate in an environmental impact statement (EIS) that makes it impossible for the company to comply in a reasonable fashion. As you weigh the volume of comments submitted either for the record or those made at public hearings, we encourage you to withstand immense political pressure by project opponents.

Attempts to broaden and create complexity in the scope of analysis so as to guarantee legal appeals that will drag the approval process out for years to come are not productive. What the public wants and expects is compliance with prudent environmental standards and the potential this project has to create new jobs. These prerequisites are not mutually exclusive of one another; and, in fact, that objective has been demonstrated by other port infrastructure projects throughout the United States. The GPT should be no exception. We urge you to reject attempts to influence the shape of the EIS so that it is impossible for new jobs to be created in a timely manner.

20 F Street NW, Suite 600  
Washington, DC 20001  
Phone: 202-789-0789  
Fax: 202-898-0522  
grains.org



The US Grains Council participated in a recent study with our colleagues from the U.S. soybean industry which warned that underinvestment in the U.S. transportation infrastructure, coupled with increased investment among our competitors, could significantly erode our competitive advantage in the international marketplace. The study, "Farm to Market-A Soybean's Journey," was commissioned to develop a more precise understanding of how U.S. soybeans, corn and other commodities—both nationally and on a state-by-state basis—are transported to customers and the obstacles to efficiency and profitability that these transportation challenges may present. The conclusion in the study was this: America continues to devote minimal resources to upgrading our highways, bridges, and creating new infrastructure to a standard that 21<sup>st</sup> century agriculture requires. Our competitors, on the other hand, continue to make substantial investments in their own infrastructure capacity to prepare for increased demand and exports.

Pacific Northwest ports accounted for over 26% of U.S. grain exports in 2011. Creating railroad and port infrastructure is imperative for our economy, job generation and growth and we would simply note that the GPT project is designed to accommodate a number of different commodities, not just coal. The fact of the matter is, the Pacific Northwest infrastructure capacity accommodates the westerly expansion of crops and increased corn, soybean and other grain trade with Asia. We therefore believe that the GPT project can and should be permitted and constructed pursuant to rigorous, site specific environmental review, but it must be also accomplished in a timely fashion.

It is essential it is to move forward with this critically important project and expand our nation's much needed infrastructure investment to meet the growing export demand for agricultural commodities and create economic growth and jobs in the Pacific Northwest.

Sincerely yours,

Floyd D. Gaibler  
Director, Trade Policy and Biotechnology