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Comment on the Gateway Pacific Terminal EIS scope

This comment will be confined to the economic impacts that must be considered and balanced in the EIS evaluation process. The more significant impact- the global carbon budget, and the rapidity with which we warm the planet and acidify the oceans –is actually outside the decision-making authority of the jurisdictions involved.

The comment to follow is in two sections, and at the end of each section there is a conclusion for that section.

1. Costs of mitigating impacts on surface transport along entire rail route

The potential tax revenues from the GPT are estimated to be on the order of several million dollars per annum, once the facility is operating. This provides the financial scale against which to measure adverse economic impacts, that is, incremental requirements on public infrastructure to mitigate the train impacts.

There are > 20 cities along the train route from mine to port which have vital surface transport, at grade, crossing the Burlington Northern train tracks. The GPT at 54 million tons/annum capacity will necessitate another 18 train passages per day, at 1.5 miles/train. At 20 miles/hour speed, that added cumulative closure time is $(18 \times 1.5 / 20) = 1.4$ hours. Since however the other urban obstacles impede the train speed for other reasons, we need to consider a lower mean passage speed. At 10 miles/hour speed, the added cumulative closure time would be 2.8 hours.

Bellingham is one of those cities, neither the biggest (Seattle) nor the smallest, just rather typical. A significant increase in train traffic would require mitigation (above-grade bridges) for pedestrians, bicyclists, cars and trucks to cross the tracks at several points in Bellingham. These points would include *at a minimum* F Street, Lower Cornwall Ave, and Harris Street. How much would each vehicle/pedestrian bridge cost? Based on other cities' recent costs for comparable improvements, e.g. that of Ferndale, it is safe to posit a cost of approx \$35-million per bridge.

Thus the required infrastructural mitigation costs for Bellingham would probably be on the order of 3X\$35-million, or about \$105-million. Legacy railway laws from the 19th Century ensure that about 95% of such mitigation expenses must be borne by the public, through taxes. Thus Bellingham's mitigation liability would be on the order of \$100-million. For the twenty cities along the corridor, individual requirements would differ. Some cities (like Seattle) would have greater costs just due to scale. Others, like Mt. Vernon, Edmunds, and Everett, would have greater costs due to their peculiar layout.

However, just to get a conservative order-of-magnitude estimate, I will assume that on average those cities bear costs like the estimated Bellingham costs. That's

$$20X(\$100\text{-million}) = \$2\text{-billion}$$

of publicly funded mitigation. At a tax-revenue rate of \$5-million/annum, it would take how many years for the accrued taxes to offset the up-front infrastructure costs? The answer is

$$(\$2\text{-billion})/(\$0.005\text{ billion/annum}) = 400\text{ years.}$$

So, the public will be required to make infrastructural mitigations up-front, but over a *four-century payback period* that money will be recovered in taxes.

The point of this exercise is to show that the estimated taxes are too small and too localized (Whatcom County, and Ferndale) to balance the huge infrastructure incremental liabilities *all the way along the rail corridor*. Any payback period longer than 20 years is an absurd and punitive action against the cities along the rail corridor.

Conclusion 1: The EIS scope must include cumulative infrastructure liabilities all the way along the rail corridor, not just in the immediate vicinity of the port.

2. Northern inland waters ship traffic effects on aquatic habitat

The inland waters from Cape Flattery to the Strait of Georgia are a nexus for extremely challenging aquatic-resource challenges. All five species of salmon are in decline. Herring- a principal feedstock for salmon –are in decline. Killer whales (orcas) are in decline. Unfortunately, we do not understand why these declines are occurring, *only that they are* occurring. There are huge economic and ecologic services we receive from these natural resources that are in decline.

The GPT project will ship 54-million tons per year out of Cherry Point. These mammoth cape-class ships dwarf any current shipping in the area. They will daily ply the coastal waters linking Cherry point, Peapod Rocks, Rosario Strait, Smith Island, the Strait of Juan de Fuca all the way out to the edge of the Nitinat Shelf before escaping to deeper and more open waters. What will be the effect of this significant increase in ship traffic on the five species of salmon, on the feedstock for those salmon, and on the apex predator (the killer whale) which is entirely dependent on those salmon? What will be the outcome for our treaty obligations to protect the Lummi Nation's aboriginal take?

Conclusion 2: The EIS scope must include cumulative fisheries and other ecological impacts for the entire hundred-mile inland-water habitats to transited by the planned shipping.