

Following are my comments on the proposed EIS for the coal export proposal at Cherry Point.

Comprehensive and cumulative

1. The study must make a comprehensive and cumulative evaluation of the impacts of the proposal, not limited to simply the project site at Cherry Point. The adverse impacts are likely, perhaps certain.
2. It should address impacts along the transportation routes from Powder River Basin to the site, and from the site to the coal's ultimate disposition where it is burned. The adverse impacts are likely.
3. It should address the cumulative impacts of other coal export proposals that contemplate using the same overused railroads.
4. The continued mining in Powder River Basin will continue to put mercury in the streams. This impact warrants evaluation.

Health impacts:

1. The study must address the health impacts from fugitive coal dust.
2. It should evaluate the impacts of uncovered coal, since history shows us that coal companies rarely cover their loads.
3. It should evaluate the impacts of the inevitable derailments, on health, environment, rail traffic, and road traffic, including emergency vehicles that could be blocked.

No action alternative: Determine, if the impact cannot be mitigated, whether the harm outweighs the benefits of the proposal. Aggregate the costs associated with ***all impacts***.

Need

1. The needs defined in the permit application bear strong scrutiny. Please evaluate who will benefit and who will be harmed by the proposal.
2. Please review the proposal through the lens of environmental justice. That dangerous and dirty projects are sited in areas of poor, disadvantaged, or economically stressed communities violates most state and federal policies for environmental justice.

Assumptions

Do not let assumptions be rosy or optimistic.

1. The harm from coal dust is well known.
2. Derailments are a certainty.
3. Bad weather is routine, and likely to worsen in years to come.
4. The difficulty to fund public infrastructure upkeep is a sad fact that the study cannot ignore.

Another criterion to consider is the intangible but likely quantifiable harm to Washington's reputation as a clean and green—Evergreen State.

Who pays?

Who will pay, and who will profit from this proposal? Are the benefits concentrated with out-of-state private companies, while the costs are distributed to citizens and other living beings along the rail routes?