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Comments re Scoping for the Proposed Gateway Pacific Terminal EIS

A Cumulative Environmental Impact Statement Is Required for the Gateway Pacific Coal Terminal Project

The Gateway Pacific Coal Terminal EIS requires an assessment of both the significant individual project impacts and the significant cumulative impacts of the coal and oil terminals proposed and existing in the Pacific Northwest and British Columbia, since the terminals affect or will affect the same land, water and air masses.

The Project Description

SSA Marine, owned 49% by Goldman Sachs, partnering with Peabody Energy, the largest coal company in the world, proposes this project. The project is to strip mine up to 140 million tons of coal a year in Wyoming and Montana, transport the coal to the West Coast in uncovered railway cars, unload and store the coal at several West Coast ports, then ship the coal through critical habitat in oversized freighters, to be burned as a power source for China. SSA Marine purchased the coal cheaply and proposes to sell it for many times its purchase price. The coal price is cheap for SSA Marine because U.S. taxpayers subsidize it. The intent behind the subsidy was for the coal to be used, if needed, to power the United States, not other countries. Now, since coal fetches a much higher price in Asia, SSA Marine intends to reap enormous profits there, at the expense of the planet's environment and the best interests of the U.S.

Coal's toxins, pollutants and particulates destroy the environment, impose huge costs on the economy, and impose vast personal and economic costs on human health, costs that will be borne by U.S. taxpayers. Burning coal releases approximately twenty toxic chemicals. These include arsenic, lead, mercury, nickel, vanadium, beryllium, cadmium, barium, chromium, copper molybdenum, zinc, selenium and radium. During combustion, the reaction between coal and air produces oxides of carbon, including carbon dioxide, sulfur dioxide and various oxides of nitrogen. Because of the hydrogen and nitrogen components of coal, hydrides and nitrides of carbon and sulfur are also produced during the combustion of coal in air. These include hydrogen cyanide and sulfur nitrate. Acid rain is produced when sulfur dioxide reacts with oxygen to form sulfur trioxide. This reacts with water molecules in the

atmosphere to form sulfuric acid. In addition, mercury emissions from burning coal are converted into methyl mercury, a toxic compound, harmful to wildlife and people. This toxic mercury is concentrated increasingly as it works its way up the food chain.

Project Benefits

What are the environmental benefits of this project? None.

Are there benefits of this project? SSA and Peabody will reap huge profits. There will be a few hundred temporary construction jobs created and fewer sustained jobs. All workers' health will be compromised, depending on how much exposure each has to coal and coal dust, not to mention the sulfuric acid to which workers will be exposed, when coal and coal dust is exposed to water.

EIS Scoping

What do you say about EIS scoping, when the project is environmentally devastating in its entirety? Seriously??

This project will directly negatively affect the health of the coal miners and construction and transportation workers. It will directly negatively affect all communities along the coal's transport routes, through the toxic coal dust that will infiltrate the soil, air, streams, creeks, rivers, ponds, lakes, straits, oceans, and other aquatic areas through which the coal will travel. This project will directly and indirectly affect the health of plants and animals, including U.S. citizens as a whole, because coal burning fouls the air, increases global CO₂, and hastens climate change. It will bring more record temperatures, more days of scorching heat, more severe drought, increases in sea level, and increased flooding, to name a few environmental effects. Coal burning also will increase the acidity in the air, water and soil, hastening directly the decline of many species, including humans. Lastly, the increased cost of health care and the cost of coal cleanup from mining, transporting and burning coal will greatly eclipse any monetary benefits of this project.

Scoping Issues

Widespread significant environmental impacts from this proposed project that require scoping include:

- The impact of coal's toxic pollution on the air, water and soil caused by mining, storing and transporting up to 140 million tons of coal each year from Wyoming and Montana to Asia.
- The impact of toxic emissions that will circulate from Asia to the U.S. through wind, water and dust, that will be caused by burning up to 140 million tons of U.S. coal in Asia each year.
- The impact on the planet, including accelerating climate change and increasing acidity in the soil, water, and air, of burning up to 140 million tons of U.S. coal in Asia.
- The huge cost of cleanup to the U.S. taxpayers for mining, storing, and transporting up to 140 million tons of coal from Wyoming and Montana to Asia, and how to shift these anticipated costs to SSA Marine and Peabody Energy.

- The impact of cargo ship collisions and spills, such as the *Exxon Valdez* catastrophic spill in Alaskan waters, or the incident with the *Shen Neng* coal carrier colliding with the Great Barrier Reef in Australia in April 2010.

Localized significant environmental impacts from this proposed project that require scoping include:

- The impact of coal dust on the health and health care costs of workers directly exposed to the dust.
- The impact of habitat destruction or impairment directly caused by the project to plants and animals along the entire route of the project.
- The impact of sediment on animals and plants, caused by the project.
- The impact of coal dust locally on plants and animals.
- The impact on all endangered species that will be caused by the project.
- The impact of leaks and spills of fuel, oil, and other toxic chemicals from transport ships.
- The impact of leaks and spills of fuel, oil, and other toxic chemicals from trains, particularly train collisions and train derailments, such as the catastrophic *Cantara Loop* spill into the Sacramento River in July 1991, above Dunsmuir, California.
- The impact of coal spills into the water during loading.
- The impact of coal dust blown into water or inhaled by mammals, birds and humans.
- The impact of noise from trains, ship engines and machinery.
- The impact of congestion on land caused by coal trains and increased traffic.
- The impact of congestion on the local waters caused by increased shipping and increased coal cargo vessel size.
- The impact of invasive species contained in ballast and on the outside of vessels.
- The impact of increased marine sound on marine life.
- The impact of interference with marine life movement.
- The impact of ship strikes on marine mammals.

Some Proposed Mitigation Measures

- To mitigate health effects on miners, construction and transport workers—an all expenses paid/all conditions covered lifetime health care plan for each worker who works more than 500 hours directly or indirectly on the project or mining coal for the project.
- To mitigate shipping impacts—require double hulled vessels, more than the minimal crew that ordinarily serves on freighters, and U.S. pilots for all ships transporting coal and oil in U.S. waters.

- To mitigate cleanup expenses—a requirement that SSA Marine and Peabody Corporation agree to ensure that sufficient funds are available to clean up all environmental effects of the project, as well as a requirement that the amount of funds be set by an independent auditor and updated annually, and that the cleanup funds be guaranteed in a manner that cannot be bankrupted out.

Conclusion

Unless the significant environmental, economic and health impacts can be mitigated substantially and with certainty, the “no action” alternative is mandated.