



United States Department of the Interior

NATIONAL PARK SERVICE
Pacific West Region
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In reply refer to:
L76 (PWR-NR)

January 15, 2013

GPT/BNSF Custer Spur EIS Co-Lead Agencies
c/o CH2M HILL
1100 112th Avenue NE, Suite 400
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To Co-Lead Agency Representatives:

The National Park Service (NPS) appreciates the opportunity to participate in the scoping process for the Gateway Pacific Terminal/Custer Spur Environmental Impact Statement (EIS). Our comments cover five general categories: the scope of the EIS, air quality impacts, impacts on aquatic habitats and wildlife, effects on visitors to NPS areas and climate change.

Scope of the EIS

Five coal export terminals are currently under consideration in the states of Oregon and Washington. The Gateway Pacific Terminal near Bellingham, Washington, would have the capacity to export up to 54 million tons of coal per year—approximately five percent of the total amount of coal produced in the U.S. in 2011. Ambre Energy has applied for a permit to export 8.8 million tons of coal per year from the Port of Morrow Terminal near Boardman, Oregon. We understand Ambre Energy and Arch Coal are proposing to export 20-80 million tons of coal per year from the Millennium Terminal in Longview, Washington. Export capacity for the Coos Bay and Port of St. Helens projects in Oregon is unknown.

Given the potential for regional export of over 100 million tons of coal per year, the NPS is concerned these projects—both individually and cumulatively—could have significant long-term consequences for the residents, visitors, environment and cultural resources of the northern Rocky Mountains and Pacific Northwest. Therefore, we believe the U.S. Army Corps of Engineers, as lead federal agency, is obligated to coordinate with all involved state and local agencies in preparing a programmatic EIS that rigorously addresses the cumulative effects of all five export terminal projects in the region. The EIS should fully evaluate all direct and indirect effects of the coal export process, including railroad shipment from the Powder River Basin, terminal operations, marine vessel shipment and resulting pollutants emitted from Asian power plants.

Without knowing the proposed train and shipping routes and the ship refueling locations, we cannot identify all NPS areas that could potentially be affected by coal export from the Pacific

Northwest. A review of existing rail and shipping routes indicates coal export could affect up to a dozen NPS units in Montana, Idaho, Oregon and Washington. After transport routes have been identified, we can provide further information about which NPS areas should be evaluated in the Gateway Pacific Terminal/Custer Spur EIS and/or programmatic EIS for all five export terminal projects.

Air Quality

The 1916 Organic Act provides air quality protection in all units of the National Park System by directing the NPS to conserve the resources and values of parks in a manner that will leave them “unimpaired for the enjoyment of future generations” (16 U.S.C. 1). The 1977 Clean Air Act (CAA) amendments include additional requirements to “preserve, protect, and enhance the air quality” in 158 mandatory Class I national parks and wilderness areas (42 U.S.C. 7470 et seq.). The CAA also gives the NPS an “affirmative responsibility” to protect air pollution-sensitive resources, including visibility, streams, lakes, vegetation, soils and wildlife in Class I areas. Coal export through Pacific Northwest terminals could potentially affect air quality in four Class I areas—Glacier, Mount Rainier, North Cascades and Olympic National Parks (NP).

All national parks currently experience human-caused visibility impairment and many exhibit ecosystem effects from atmospheric sulfur, nitrogen and mercury deposition. In 1999, the U.S. Environmental Protection Agency promulgated the Regional Haze Rule, which requires each state to develop a plan to improve visibility in Class I areas, with the goal of returning visibility to natural conditions by 2064. We are concerned that air pollutants associated with coal export and consumption will further degrade visibility, affect sensitive waterbodies, and exacerbate mercury contamination in park wildlife.

The EIS should assess air quality impacts of coal dust from the rail cars and at the terminals; vehicle emissions from trains, ships (both in transit and at port) and motorized equipment at the terminals; and trans-Pacific transport of emissions from Asian power plants. Pollutants of concern include particulate matter, sulfur oxides, nitrogen oxides and mercury. The analysis should include all NPS units within 50 km of the rail lines and shipping channels, and all units within 100 km of the terminals. National Park Service staff can provide guidance on emission estimates, atmospheric modeling and natural resource impact assessments.

Aquatic Habitats and Wildlife

The EIS should evaluate potential impacts of the coal trains on water quality and wildlife in Glacier NP. The Burlington Northern Santa Fe railroad borders, and at times enters, the southern boundary of the park. The railroad is adjacent to Bear Creek and the Middle Fork Flathead River and it crosses several park streams. We are concerned about impacts on water quality and aquatic life from coal dust, diesel emissions and potential oil spills and train derailments. In addition, research has shown the current traffic level of about 30 trains per day affects wildlife movement and survival. For example, from 1999-2010, five out of 32 confirmed deaths of threatened grizzly bears in the northern Continental Divide ecosystem of Montana were due to collisions with trains (Mace and Roberts, 2011). Increased rail traffic could further restrict wildlife movement and increase mortality in and near the park.

The EIS should also analyze effects of the export terminals and increased ship traffic on aquatic habitats and wildlife in Puget Sound and the Columbia River, including the potential for shipping accidents resulting in coal and/or fuel spills. National Park Service areas with potentially affected shorelines and watersheds in the Puget Sound Basin include Ebey's Landing National Reserve, North Cascades NP, Olympic NP and San Juan Island National Historic Park (NHP). Parks in the Columbia River Basin include Fort Vancouver National Historic Site and Lewis and Clark NHP. The ecological integrity and associated human values of these NPS units are directly and indirectly linked to the overall health of Puget Sound and the Columbia River. The NPS is concerned that coal export could adversely impact the health of these waterways in several interrelated ways.

For example, we understand more than 400 Panamax class or Capesize class vessels are expected to dock at the Gateway Pacific Terminal each year. Comparing that number to the approximately 1,200 commercial vessels that visited the Port of Seattle in 2010 indicates this would be a significant expansion of shipping traffic in Puget Sound. A key attraction for visitors at San Juan Island NHP is watching marine wildlife, including the iconic Puget Sound orcas. We are concerned about potential harmful effects on endangered orcas from increased ship traffic, noise and loss of critical forage fish habitat at the proposed site of the Gateway Pacific Terminal. The potential for impacts to anadromous fish species such as salmon and steelhead should be evaluated because these species are vital to the regional economy, as well as being fundamental resources at Olympic NP, North Cascades NP and Lewis and Clark NHP.

Park Visitors

National parks provide outstanding recreational opportunities for both residents and out-of-state visitors. Park visitors are attracted by the prospect of enjoying unspoiled beaches, scenic vistas, historic landscapes, wildlife viewing, fishing and other activities. In 2009, there were more than 7.5 million visits to NPS areas in Washington alone, resulting in \$248 million spent in local communities. The EIS should analyze the impact of increased train and ship traffic, and resulting effects on air quality, water quality and wildlife, on visitor use and enjoyment of affected NPS areas. Visitor safety is a concern at Glacier NP because several high use and developed areas are adjacent to the railroad tracks and more rail traffic increases the likelihood of derailments.

Climate Change

Residents of Oregon and Washington are concerned about climate change and both states recently passed regulations to reduce instate emissions of greenhouse gases. Conversely, the proposed coal export projects will increase greenhouse gas emissions. Coal export will also increase emissions of black carbon (soot), a climate forcing agent that warms the Earth by absorbing heat in the atmosphere. Black carbon deposition affects the timing and magnitude of snow and glacier melt, with resulting impacts on fisheries, hydroelectric utilities and recreation.

The effects of climate change are already apparent in national parks and the impacts are profound. In the Pacific Northwest, glaciers are retreating, patterns of precipitation are shifting, and flooding is occurring with greater frequency and magnitude. In the past decade alone, the NPS has spent nearly \$50 million repairing damage from flooding at Mount

Rainier, Olympic, and North Cascades NPs. Predictions indicate the impacts of climate change are likely to worsen in coming years, and this presents unprecedented risks and challenges for the NPS. Given the magnitude of proposed coal export through the Pacific Northwest and the significant policy implications associated with the U.S. supplying coal to Asian markets, it is essential the EIS thoroughly evaluate project impacts on climate change.

We look forward to continued collaboration with the Co-Lead Agencies throughout the EIS process. If you have any questions about our comments, please contact Tonnie Cummings, Regional Air Resources Specialist, at 360-816-6201 or Tonnie_Cummings@nps.gov.

Sincerely,



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