



US Army Corps
of Engineers



DEPARTMENT OF
ECOLOGY
State of Washington



Combined NEPA/SEPA

Environmental Impact Statement

Proposed Gateway Pacific Terminal/Custer Spur

Scoping Summary Report



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MARCH 29, 2013





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Prepared for
U.S. Army Corps of Engineers
Washington Department of Ecology
Whatcom County

March 29, 2013

CH2MHILL®

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Acronyms and abbreviations

AFL-CIO	American Federation of Labor and Congress of Industrial Organizations
APE	area of potential effect
BNSF	Burlington Northern Sante Fe Railroad
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
Co-Lead Agencies	U.S. Army Corps of Engineers, Washington Department of Ecology, and Whatcom County
COPD	chronic obstructive pulmonary disease
Corps	U.S. Army Corps of Engineers
CZMA	Coastal Zone Management Act
DEP	diesel exhaust particulate
DNR	Washington State Department of Natural Resources
Ecology	Washington Department of Ecology
EEZ	Exclusive Economic Zone
EIS	environmental impact statement
EMS	emergency medical services
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FTA	Federal Transit Administration
GPT	Gateway Pacific Terminal
HUD	Department of Housing and Urban Development
IMSBC	International Maritime Solid Bulk Cargoes
ITS	intelligent transportation system
kW	kilowatts
MRC	Marine Resources Committee
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NO ₂	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NWCAA	Northwest Clean Air Agency

OSHA	Occupational Safety and Health Administration
PAH	polycyclic aromatic hydrocarbons
PID	Project Information Document
PM	particulate matter
PM ₁₀	particulate matter less than 10 micrometers in diameter
PM _{2.5}	particulate matter less than 2.5 micrometers in diameter
PSL	Pacific sand lance
RCW	Revised Code of Washington
SEPA	State Environmental Policy Act
SIP	Washington State Implementation Plan
SR	State Route
TIP	Transportation Improvement Program
U&A	usual and accustomed grounds and stations
UFP	ultrafine particles
UGA	urban growth area
USFW	U.S. Fish and Wildlife Service
UTC	Washington State Utilities and Transportation Commission
WAC	Washington Administrative Code
WAC	Washington Administrative Code
WDFW	Washington State Department of Fish and Wildlife
WDNR	Washington Department of Natural Resources
WSDOT	Washington State Department of Transportation



1. Introduction

1.1 Proposal overview and context

Pacific International Terminals, Inc., has proposed to construct and operate a deep-water, multimodal terminal for the export and import of dry bulk commodities in the Cherry Point Industrial Urban Growth Area (UGA), which is zoned for heavy-impact, industrial use in Whatcom County, Washington. The Gateway Pacific Terminal (GPT) would be located between BP’s Cherry Point refinery and the Alcoa Intalco works aluminum smelter (see Figure 1-1). The proposed GPT includes two materials handling and storage areas, as well as a wharf and access trestle. At full operation, the proposed terminal would have the capacity to export approximately 54 million metric tons per year of dry bulk commodities, including, but not limited to, coal, grain products, potash, and calcined petroleum coke.

In a related proposal, BNSF has proposed modifying existing rail facilities adjacent to the Gateway Pacific Terminal site to support increased rail traffic to and from the proposed terminal (Figure 1-1). This proposal is related to the GPT proposal but will be the subject of a separate U.S. Army Corps of Engineers (Corps) permit application. Proposed rail modifications include installation of receiving/departure tracks west of the BNSF mainline and development of a second track along the 6-mile Custer Spur to the proposed GPT.

The Corps, the Washington Department of Ecology (Ecology), and Whatcom County (collectively referred to as the Co-Lead Agencies) are preparing an environmental impact statement (EIS) to analyze the environmental impacts of a proposed deepwater multimodal terminal in the Cherry Point industrial area of Whatcom County and modifications to the BNSF Custer Spur.

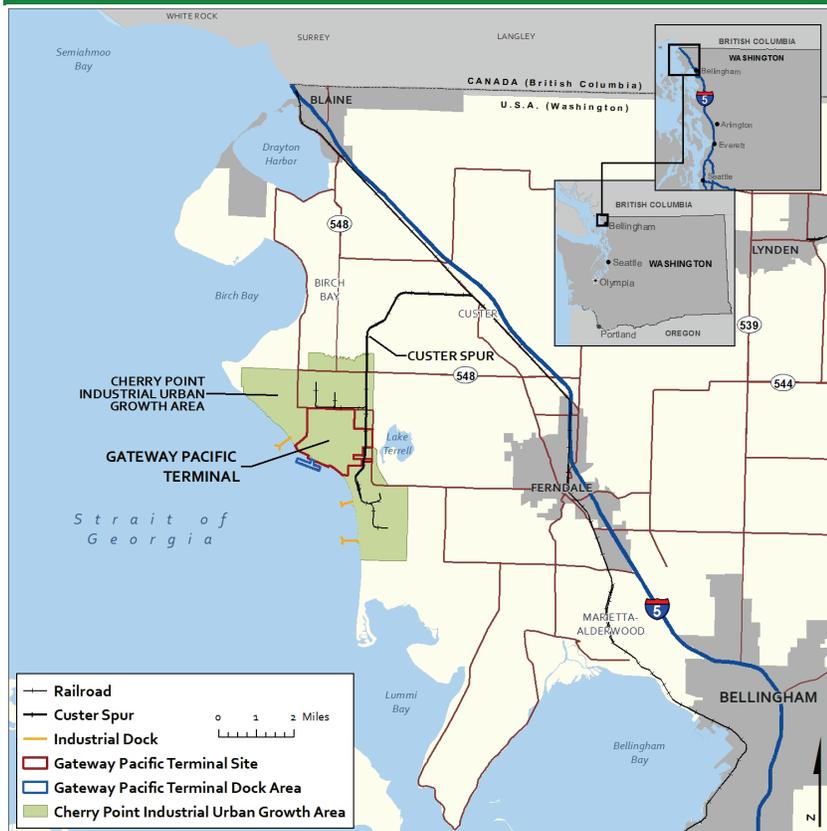
The Co-Lead Agencies must comply with the National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA) in reviewing permit applications relating to the proposed projects. Both NEPA and SEPA require an independent analysis of the issues that are significant to the proposed action before making decisions on any permit. The Co-Lead Agencies are responsible for providing this

The scoping comment statements are portrayed as they have been provided. The viewpoints are reported as opinions, not factual information, nor do they represent what will actually be studied in the EIS. All comments are under review by the Co-Lead Agencies to help inform the breadth and range of considerations in the EIS.



Existing docks at Cherry Point

Figure 1-1
Location of Gateway Pacific Terminal and Custer Spur proposals



independent review of the proposed projects and opportunities for the public to participate in the environmental review process.

The EIS process started with scoping, which is an important step during which the public is invited to comment on what impacts should be included in the EIS. Comments were collected at in-person scoping meetings, online, and in writing. This report summarizes those comments by meeting, by resource topics mentioned, by agency, by organized interest group, and by the businesses that provided the comments. After considering comments, the Co-Lead Agencies will decide what should be included in the EIS.

1.1.1 Purpose of the scoping process – to inform the scope of the environmental impact statement

This Scoping Report summarizes the approximately 125,000 comments collected at in-person scoping meetings, online, and in writing, and it provides an overview of public outreach activities. After considering the comments, the Co-Lead Agencies will decide what should be studied in the EIS. This scoping report is for the purpose of describing

the scoping process and the comments received. The co-leads will be making a determination on the scope of the EIS in the near future after reviewing the scoping comments and conducting internal policy reviews.

A few elements are common to all EIS documents. The EIS will describe the proposal, the purpose, and goals of the proposal and the range of reasonable alternatives under consideration. Alternatives are considered to avoid and minimize environmental effects. In addition, a no action alternative is included as a point of comparison for the proposed project alternatives. Following the description of the alternatives, the EIS will document the existing environmental conditions, then include analyses of the potential impacts that might result from each of the alternatives, including the no action alternative. Finally, if significant impacts are anticipated, then the EIS must explore possible mitigation measures to those impacts. While the Co-Lead Agencies will establish a scope of study, flexibility must be retained to make reasonable adjustments to the scope of an EIS if significant new circumstances or information arise that bear on the proposal or its impacts.

Once a draft EIS is published, the public will be invited to review and comment on the document and participate in public hearings.



2. Scoping process

Scoping is an initial step in the environment analysis process (Figure 2-1). The Co-Lead Agencies held a 120-day scoping comment period from September 24, 2012, to January 22, 2013. During this time, the public, agencies, and Native American Tribes were able to learn about the proposals and the EIS process and to provide scoping comments.

Figure 2-1
Steps in the environmental analysis process



Input from the public scoping process will be used to develop a scope of analysis for the Draft EIS, which is the next major step in the environmental review process.

2.1 Providing comments

During the scoping process, the Co-Lead Agencies provided multiple opportunities for interested members of the public to learn about the proposals and the EIS process and to provide scoping comments. The Co-Lead Agencies invited members of the public, government agencies, Native American Tribes, and other organizations to provide scoping comments through a variety of methods, including:

- Submitting a hardcopy comment by mail to the GPT/BNSF Custer Spur EIS Co-Lead Agencies care of CH2M HILL, 1100 112th Avenue NE, Suite 400,¹ Bellevue, WA 98004.
- Submitting a written comment form, made available at the scoping meetings, which could be submitted at a drop box at the meeting or mailed in.

¹ Note that the suite number has since been updated to Suite 500.

- Using the comment form on the GPT/BNSF Custer Spur EIS website: *www.eisgatewaypacificwa.gov*.
- Submitting a comment by email to *comments@eisgatewaypacificwa.gov*.
- Making a public verbal comment at the microphone at a scoping meeting.
- Making an individual verbal comment at a scoping meeting.

All comments received were posted on the website so users could review others' or their own comments. All comments are available in a searchable format under name, city, date or comment topic. When many copies of the same comment were received, the comments were reviewed separately, but were uploaded as one document. Similarly, some organizations collected a large number of comments from individuals and then submitted them in one package; these were also uploaded as one document, in the same format which they were submitted.

2.2 Scoping purpose

Public scoping is an important element of the NEPA and SEPA processes. Scoping is an effective way to record concerns of the public, affected agencies, and other interested parties. Significant issues may be identified through public and agency comments. Scoping is not conducted to resolve differences concerning the merits of a project or to anticipate the ultimate decision on a proposal. Rather, scoping helps prepare a comprehensive and focused EIS that will help inform the decision-making and permitting processes.

The intent of the GPT/Custer Spur scoping process was to gather input on the following topics:

- Reasonable range of alternatives
- Potentially affected resources and extent of analysis of those resources
- Significant unavoidable adverse impacts
- Measures to avoid, minimize, and mitigate effects of the proposals

2.3 Public involvement plan

To determine public involvement needs and objectives for the scoping phase of the EIS, the Co-Lead Agencies released a public involvement plan in September 2012. The plan outlines the goals, objectives, methods, strategies, and schedule for the public involvement program. The Council on Environmental Quality's Citizen's Guide to the NEPA process describes citizen involvement as one of the two major purposes

of environmental review.² Similarly, Washington Administrative Code 197-11-030 calls for agencies to “encourage public involvement in decisions that significantly affect environmental quality.”

The Co-Lead Agencies developed the following goals for the public involvement process:

- Deliver a “transparent” environmental review process that provides ongoing, inclusive, and meaningful two-way communication between the Co-Lead Agencies and the public.
- Meet the regulatory requirements and intent associated with NEPA, SEPA, federal Executive Order on Environmental Justice³, and Title VI requirements.
- Encourage active participation of stakeholders—those agencies, interest groups, and individuals with particular “stakes” in the outcome of the project.

The complete Public Involvement Plan is available on the EIS website: www.eisgatewaypacificwa.gov under the Resources tab.

2.4 Notification of scoping

2.4.1 NEPA and SEPA notification

The federal process began with the publication of the Notice of Intent (NOI) (Appendix A) in the Federal Register on September 21, 2012. A notice of correction for the NOI was published in the Federal Register on December 10, 2012, revising the Seattle scoping meeting information.

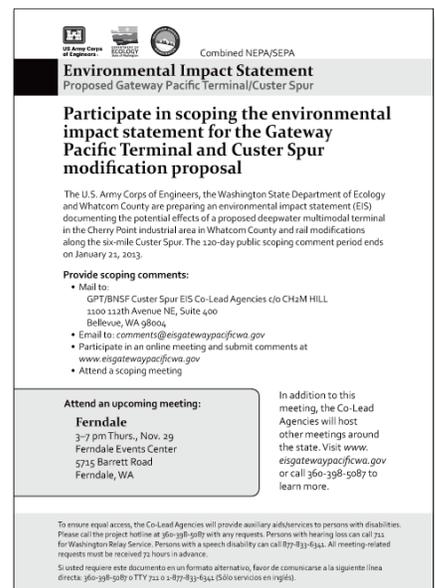
The NOI included the purpose of the study, the proposals’ limits, need for agency input, potential environmental impacts of the proposals, a contact name for additional information regarding the proposals, and a description of alternatives to be considered. In addition, the Corps sent letters directly to representatives at federal, state and local agencies, elected officials, and Tribes, inviting them to submit written comments on the proposals’ potential significant impacts or issues to be studied and considerations for mitigation measures. Ecology also sent a letter to 34 Tribes in the State of Washington, informing them of the scoping comment period and inviting them to comment on the scope, as well as offering government-to-government consultation. These parties were also asked to notify the Co-Lead Agencies of the applicable permit and environmental review requirements of the agency and the scope and content of the environmental information germane to the agencies’ statutory responsibilities in connection with the proposed projects.

² Council on Environmental Quality Executive Office of the President. 2007. *A Citizen’s Guide to the NEPA: Having Your Voice Heard*. Available at http://ceq.hss.doe.gov/nepa/Citizens_Guide_Dec07.pdf. December.

³ Environmental Justice Considerations in the NEPA Process, available at <http://www.epa.gov/oecaerth/nepa/nepaej/>.



The GPT EIS web page serves as an information clearinghouse on all elements of the environmental process.



This example scoping notice was sent to potentially interested parties and provided information about public meetings and opportunities to learn more about the proposals.

The state and local process began with issuance of a SEPA Determination of Significance by Whatcom County. Similar to the NOI, the Determination of Significance included a description of the proponent and location of the proposal. It explained who the lead agencies are and that it has been determined that an EIS is required. Finally, it identified the preliminary elements of the environment for the evaluation of the proposals and a contact name for additional information regarding the proposals. Whatcom County mailed the SEPA Determination of Significance and a notification letter outlining the scoping process to agencies, jurisdictions, and adjacent property owners (see Appendix B).

A legal notice (Appendix C) was published in *The Bellingham Herald* on September 24, 2012, to provide official notice of the start of the EIS process and the scoping comment period.

2.4.2 Public and media notification

Public notification for the scoping comment period was provided in the NOI, through the Seattle District Special Public Notice, on the EIS website, in press releases, via email, and through paid newspaper advertisements. The website (www.eisgatewaypacificwa.gov) was the primary means of communicating with the public about the scoping process. The web site includes an overview of the proposal, a video summarizing the scoping process, an online comment form, database of public comments, and a library of resource material. Approximately 64,000 visitors accessed the EIS website.

The Co-Lead Agencies placed display ads in *The Bellingham Herald* and *The Seattle Times* on September 24, 2012, to advertise the start of the 120-day comment period. Newspaper advertisements also ran in local papers approximately 1 week before each scoping meeting. Table 2-1 lists the publications and dates for these display advertisements, number of copies circulated with the advertisements, and publication dates. Appendix D includes tear sheets for each display ad and a summary of the media coverage that was tracked throughout the scoping period.

The Co-Lead Agencies sent out news releases throughout the scoping period, resulting in extensive coverage in local, state, and national publications. In total, 591 articles about the proposals appeared in a wide variety of media outlets. Appendix E includes all news releases. Also available on the EIS website is a summary of media coverage from September 2012 through January 2013.

Community speaks out about controversial coal terminal near Cherry Point



by AMY MORENO / KING 5 News
 Posted on October 27, 2012 at 4:59 PM
 Updated Saturday, Oct 27 at 8:00 PM
 BELLINGHAM, Wash. - Hundreds for and against a controversial proposal to build a coal export pier near Cherry Point packed a Bellingham High School Saturday.

News outlets, such as King 5 News, included coverage of scoping meetings.

Table 2-1
Newspaper advertisements

Publication	No. of newspaper copies circulated (estimate)	Publication Date(s)
Advertising start of the scoping period		
The Bellingham Herald	110,609	September 24
The Seattle Times	1,042,488	September 24
Advertising scoping meetings		
The Bellingham Herald	73,740	October 20 November 22
Ferndale Record	8,800	October 17 November 21
Journal of the San Juan Islands	5,876	October 24
Skagit Valley Herald	30,741	October 29
The Seattle Times	1,042,488	November 9
The Spokesman Review	152,154	November 27
The Columbian	71,806	December 5

Persons expressing interest to a Co-lead Agency in receiving updates on the EIS process made a request to be listed on the “Interested Members of the public” list. At the beginning of the scoping comment period (September 24, 2012) the Co-Lead Agencies sent an email to 1,634 people on the Interested Members of the public list to announce the scoping meetings. The Co-Lead Agencies sent an email on November 7, 2012, to 2,547 people and then again on December 4, 2012, to 3,085 people on the Interested Members of the Public list to remind them of the address/date change to the Seattle meeting. The email included details about the scoping period and how to provide a comment. At the end of the scoping period on January 22, 2013, the GPT EIS Interested Members of the Public list includes approximately 8,000 entries. The Co-Lead Agencies will continue to update this list as the process continues and will send email notifications at key milestones.

2.5 Scoping meetings

The Co-Lead Agencies hosted seven public scoping meetings, identified in Table 2-2, and an ongoing online open house to share information about the proposed GPT EIS process and to gather scoping comments. Nearly 9,000 people attended scoping meetings in Bellingham, Friday Harbor, Mount Vernon, Ferndale, Spokane, Vancouver, and Seattle. All



At scoping meetings, attendees could review information about the proposals and EIS process.

of the meeting venues were Americans with Disability Act and transit accessible. Additional accommodations were made upon request.

**Table 2-2
Scoping Meetings**

Date and Time	Location	Approximate No. of Attendees
Saturday, October 27, 2012 11:00 a.m.–3:00 p.m.	Squalicum High School 3773 E McLeod Road Bellingham, WA	1,800
Saturday, November 3, 2012 12:00 –3:00 p.m.	Friday Harbor High School 45 Blair Avenue Friday Harbor, WA	450
Monday, November 5, 2012 4:00 –7:00 p.m.	McIntyre Hall 2501 E College Way Mount Vernon, WA	1,000
Thursday, November 29, 2012 3:00 –7:00 p.m.	Ferndale Events Center 5715 Barrett Road Ferndale, WA	1,300
Tuesday, December 4, 2012 4:00 – 7:00 p.m.	Spokane Co. Fairgrounds Plaza 404 N Havana Street Spokane Valley, WA	850
Wednesday, December 12, 2012 4:00 – 7:00 p.m.	Clark College Gaiser Student Center 1933 Fort Vancouver Way Vancouver, WA	900
Thursday, December 13, 2012 4:00 –7:00 p.m.	Washington State Convention Center 800 Convention Place Seattle, WA	2,400



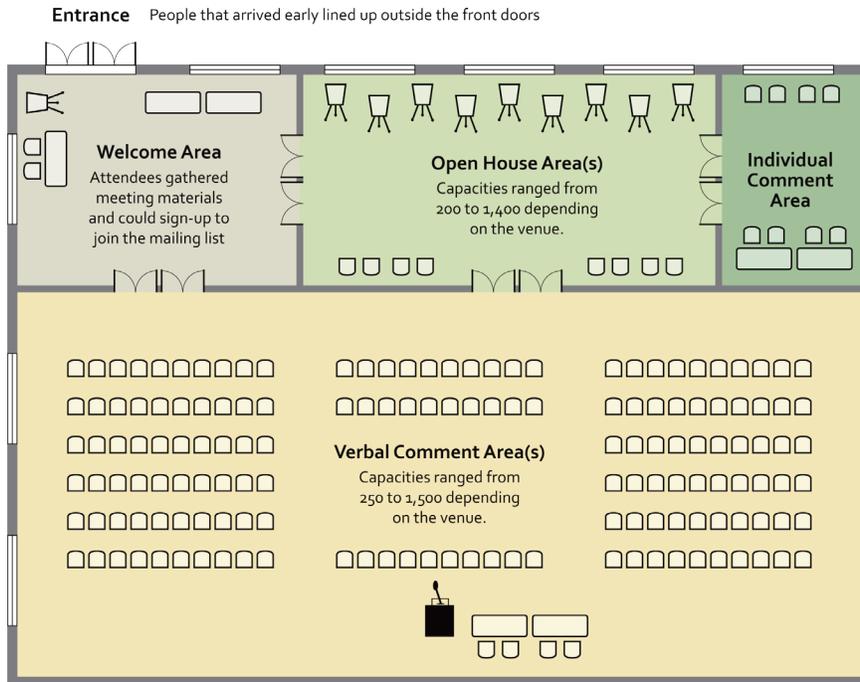
Written comments were collected from each meeting. All comments are included in the appendixes of this Scoping Report.

The Seattle meeting was originally scheduled for November 13, 2013, at North Seattle Community College. However, to accommodate high public interest, the meeting was moved to a larger venue at the Washington State Convention Center and rescheduled for December 13, 2012. The change was published in the Federal Register, advertised on the EIS process website, via email notification, and in a news release.

All of the scoping meetings were structured as informal open houses with opportunities for attendees to learn about the proposals and NEPA/SEPA environmental review process, and to provide verbal and written comments. Attendees were greeted by agency and consultant staff and received a *Community Guide to the EIS Scoping Process* and comment form. They had the opportunity to join the EIS mailing list.

Although the venue was unique, each scoping meeting provided the key elements shown in Figure 2-2.

Figure 2-2
Example meeting layout



The open house area featured display boards with information about the proposals and the EIS process, a written comment area, and a space to provide individual verbal comments to a transcriber. Copies of the meeting handouts are included in Appendix F. An additional verbal comment area provided an opportunity for individuals to provide their verbal comments in front of other members of the public. Meetings were adjusted in anticipation of meeting attendance. The meeting layout was readily expandable to accommodate higher than originally anticipated participation. More than half of participants at any given meeting were interested in listening to members of the public provide verbal comments, and, therefore, the meeting rooms were adapted or additional rooms were added to accommodate the interest.

2.5.1 Verbal comment selection process

At the first five meetings, opportunities to speak in the verbal comment room were granted on a first-come, first-served basis. Numbers were given to the first 75 to 150 attendees depending on the facility accommodations and meeting length. Due to widespread interest in the verbal comment area and requests from meeting attendees, the Co-Lead Agencies revised the format for the final two scoping meetings—Vancouver and Seattle—to a random lottery system. All



Each meeting included opportunity for a limited number of verbal comments. Anyone who was unable to provide a verbal comment had other opportunities to provide input.

attendees at these meetings could enter a random drawing for a chance to provide verbal comments.

2.5.2 Online scoping meeting

In addition to the in-person public scoping meetings, the EIS process website hosted an online scoping meeting. After viewing a brief video and reviewing scoping meeting materials, participants could submit comments through an online comment form. The online meeting ran for the duration of the 120-day scoping period. Scoping comments are still available for viewing, but comments or questions received after January 22, 2013, have not been summarized in this scoping report. The project website received over 64,000 visits during the scoping period and had over 3,500 unique visitors during the final week of the comment period alone.



3. Summary of comments

In total, the Co-Lead Agencies received nearly 125,000 comments during the 120-day scoping comment period. Comments were submitted in a variety of ways, including via email, US Mail, submitted comment forms at meetings, verbally, and online. Most of the submittals came from local or regional individuals or organizations, but also several originated from a wide geographical range. Figure 3-1 illustrates the distribution of comments from within Washington. Many comments were form letters from various groups expressing their support or opposition to the proposal. Table 3-1 shows the total scoping comments received by comment source, including comments received at scoping meetings. Comments received as form or bulk comments are provided separately from unique comments received.

All scoping comments received within the comment period were made available on the EIS process website for the public to view. Comments submitted online were read, summarized, and then approved to be made public. This review process allowed the EIS process team to ensure that all comments were read and that identical comments submitted numerous times were not published on the website. Comments were posted to the website within 1 week of receipt, with the exception of comments received during the final week, due to the large volume of comments sent in near the deadline. All scoping comments were available for viewing on the website as of February 11, 2013.

Comments are summarized based on the following groupings:

- **Public Scoping Meetings:** These meeting summaries provide an overview of themes more commonly stated at these meeting locations (see Section 3.1).
- **Public Comment Summary by Issue of Concern:** These summaries include both public comments and comments submitted by organized groups. Comments are grouped by resource topic and/or issue of concern (see Section 5.0).

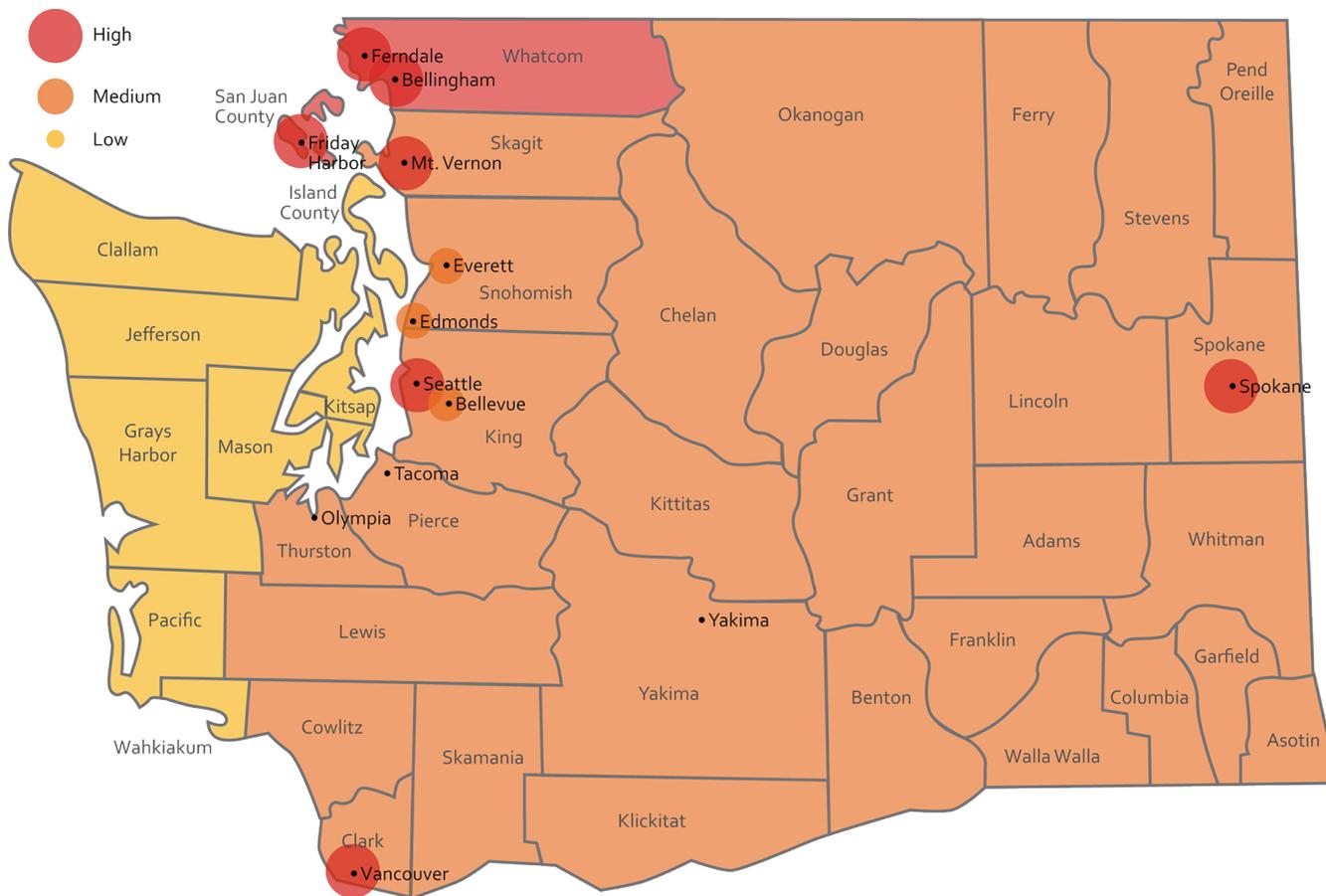
Table 3-1
Scoping comments received

Written comments submitted individually by mail, email, at meetings, or online	14,687
Verbal comments during scoping meetings	1,207
Form/bulk submitted comments	108,995
Total comments	124,889

Note: Numbers are approximate.

**Figure 3-1
Geographical range of comments**

Most comments received came from Washington state, with the majority from Ferndale, Bellingham, Friday Harbor, Seattle, Vancouver, and Spokane. There were also a large number from Oregon, Montana, and Wyoming, as well as a few comments gathered by organizations from all over the country.



- **Agency and Tribes Letters:** Letters and comments from federal, state, regional, and local agencies, as well as Tribes, were reviewed and are summarized individually (see Section 6.0).
- **Elected Officials:** Letters and comments from elected officials were reviewed and are summarized individually (see Section 6.0).
- **Organized Interest Groups:** Letters and comments from interest groups were reviewed and are summarized by interest group (see Section 7.1). Comments from organized interest groups have also been included in Section 6.0, Public Comment Summary by Issue of Concern.
- **Business Interests:** Letters and comments from businesses have been reviewed and are summarized in a list of topics mentioned the mostly frequently (see Section 7.2).

3.1 Public scoping meetings

Because of the geographic range of the meetings, comments submitted at each scoping meeting differed in theme and tone. The meeting summaries are not an exhaustive review of all comments received; rather they are intended to provide an overview of themes more commonly stated at these meeting locations. The more detailed summary of each issue is provided in Section 5.0, Public comments summarized by resource issue. The sections below summarize input received at each of the seven scoping meetings: Bellingham, Friday Harbor, Mount Vernon, Ferndale, Spokane, Vancouver (Washington), and Seattle.

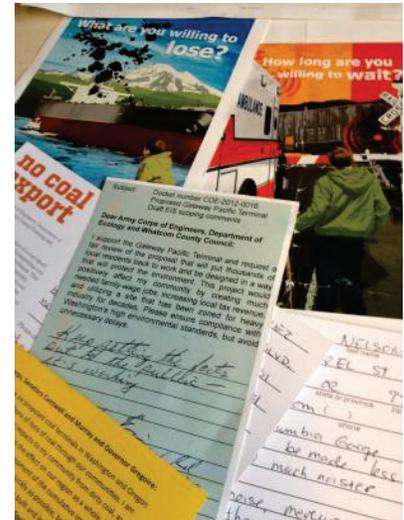
3.1.1 Bellingham

The Bellingham meeting was held on Saturday, October 27, 2012, at Squalicum High School, from 10 a.m. to 3 p.m. There were 197 public verbal comments in two separate verbal comment rooms. The two verbal comment rooms could seat up to 1,800 participants. In addition to those who gave verbal comments at the microphone, 45 people submitted individual verbal comments to staff members, and there were 249 written comments.

Bellingham scoping meeting participants emphasized their concern over the potential for the proposal to alter the existing culture and reputation of the Bellingham area as an environmentally minded community with access to outdoor recreational opportunities. Commenters were concerned that the proposal might indirectly result in economic effects on the tourism industry and affect community character. Participants also listed concerns about health impacts from coal dust, diesel exhaust, particulate matter, polluted drinking water, and noise. Potential health problems mentioned included increases in asthma, worsening of chronic obstructive pulmonary disease, development of mental health issues, and effects of toxicity on unborn children. The Bellingham attendees also asked that the environmental study consider impacts on the natural environment, such as effects on herring, salmon, and orcas from a variety of potential proposal impacts, including bioaccumulation of toxicity, impacts on eelgrass, pollution, and orcas' food supply diminishing over time. Attendees requested that the EIS consider global warming impacts from burning the coal that would be shipped to China as a result of the proposal. People identified potential traffic barrier impacts from the coal trains in Bellingham and their effects on emergency service response times and traffic to and from local businesses. Some meeting attendees supported the proposal because it could increase employment and the community's tax base.

3.1.2 Friday Harbor

The Friday Harbor meeting was held on Saturday, November 3, 2012, from noon to 3 p.m., at Friday Harbor High School. There were 83 public verbal comments at the meeting in one verbal comment



Scoping comments came in a variety of forms.



The public meeting in Bellingham on October 27 included nearly 500 verbal and written comments.

room. The school gym was used as the verbal comment room and held up to 350 attendees. In addition to those who gave verbal comments publicly, 45 people submitted individual verbal comments to staff members, and there were 140 written comments.

The primary topics voiced at the Friday Harbor meeting involved potential shipping accidents near the San Juan Islands and concern over the potential for a collision with an oil tanker. Some attendees pointed out that the area was difficult for ships to navigate, which could increase the likelihood of an accident. Commenters voiced concern about the resident orca population and requested that the environmental analysis address effects on orcas. Potential effects on the orca population mentioned at this meeting included cumulative noise and sonar effects, effects on an already stressed food supply, cumulative increases in vessel traffic through Rosario Strait, vessel strikes, and potential effects from a spill of coal or fuel. Attendees also commented that tourism was the main economic activity on the islands and that the proposal, especially if there were a spill, could negatively affect the economy and community character. Proponent commenters at the meeting mentioned that the proposal would bring in jobs and increase tax revenue.



Public meeting in Friday Harbor on November 3 included comments about potential shipping accidents near the San Juan Islands and concern over effects on orca populations and tourism.

3.1.3 Mount Vernon

The Mount Vernon meeting was held on Monday, November 5, 2012, from 4 to 7 p.m., at McIntyre Hall Performing Arts and Conference Center. A total of 75 public verbal comments were made in the auditorium of the hall. As the desire for listening to verbal comments overflowed beyond the original 450 lower auditorium seating limit, the upper levels were opened to accommodate an additional 150 seats. In addition to those who gave verbal comments publicly, 51 people submitted individual verbal comments to staff members, and there were 175 written comments.

Commenters commonly mentioned the potential environmental impacts related to the train alignment, including train noise, coal dust, and increased traffic congestion at roadway and train crossings. Meeting attendees were concerned that vehicle delays at train crossings would change consumers' shopping habits and delay suppliers and employees traveling to businesses. Attendees pointed out that delays at at-grade train crossings could affect emergency response times, because ambulances, police cars, or fire trucks might have to wait for coal trains to pass. Representatives requested that the EIS address who would be responsible to pay for mitigation of impacts at at-grade roadway/train crossings and how vehicle delays would affect jobs and businesses. Other commenters listed concerns that vibration from the coal trains could affect building foundations near the alignment. Others requested that that EIS address how the proposal could affect the number of jobs and increases to the tax base.

3.1.4 Ferndale

The Ferndale meeting was held on Thursday, November 29, 2012, from 4 to 7 p.m., at the Ferndale Events Center. There were 103 verbal comments at the microphone. The verbal comment room was large enough to seat approximately 900 persons. In addition to those who gave verbal comments publicly, 84 people submitted individual verbal comments to staff members, and there were 128 written comments.

There was a variety of comment topics at the public meeting in Ferndale focused on jobs and the environment. Meeting attendees mentioned that the proposal would strengthen the local economy through increased jobs and exports. People mentioned that the proposal would result in both blue and white collar construction and operational jobs. Attendees also pointed out that train transport is efficient and that the proposed site is a good location due to its natural deepwater port and heavy industrial designation. Individuals requested that the scope of the environmental analysis be narrow while others suggested that it should be broad. Commenters suggested that the environmental analysis address impacts on human health and the environment, including from coal dust and global warming. They also voiced concern about impacts on water quality, farms, and fishing. Commenters from Native American Tribes asked that the environmental analysis consider spiritual effects and effects on sensitive cultural archaeological sites and the cultural heritage of the site. Attendees suggested that an economic analysis should be conducted to identify how the proposal would positively or negatively affected jobs in the short and long term.



At the November 29 public meeting in Ferndale, attendees shared concerns about jobs and the environment.

3.1.5 Spokane

The Spokane meeting was held on Tuesday, December 4, 2012, from 4 to 7 p.m., at the Spokane County Fair and Expo Center. There were 85 public verbal comments at the meeting in a hall that could accommodate up to 1,500 persons. In addition to those who gave verbal comments publicly, 50 people submitted individual verbal comments to staff members, and there were 243 written comments. Negative effects of coal dust and diesel emissions on air quality and subsequent impacts on human health were among the most prominent concerns from Spokane attendees, however some countered that until the mid 1970s most of residences were warmed with coal-fired heaters. Citizens cited existing poor air quality conditions and a high prevalence of asthma in Spokane as requiring consideration in the environmental study. Increased rail traffic, safety, and impacts on local traffic were also frequently listed. Many commenters requested that the scope of the EIS include cumulative effects along the entire rail and shipping route, from Wyoming to Asia.

Overall, attendees voiced concern about global warming, support for clean energy alternatives to coal and moral opposition to exporting coal to China. Other comment themes included the cost of local infrastructure improvements to support the expanded rail system;



At the December 4 public meeting in Spokane, attendees expressed frustration about the first-come, first-served speaking arrangement. Eighty-five people gave public verbal comments, 50 people submitted individual verbal comments, and there were 243 written comments.

impacts on property values; noise and vibration; water quality; wildlife and other natural resources; emergency vehicle access; safety; and train derailment. Several representatives of Tribal nations attended the meeting and highlighted the importance of evaluating impacts on Tribal lands, treaties, and governments.

Some commenters expressed frustration over the first-come, first-served verbal comment policy. A number of attendees traveled from Montana, Idaho, and Wyoming to participate in the scoping meeting and were upset that they didn't get an opportunity to speak in the verbal comment room. However, there were at least 20 speakers who represented Montana, Idaho, and Wyoming.

The minority of individuals in support of the proposal cited economic benefits, tax revenue, and job creation as key factors. Most of these individuals identified themselves as representative of rail, union, and labor organizations. The proponents favored limiting the scope of the EIS to the Cherry Point terminal site in Whatcom County.

3.1.6 Vancouver

The Vancouver meeting was held on Wednesday, December 12, 2012, from 4 to 7 p.m., at Clark College. There were 158 public verbal comments made at the meeting in two verbal comment rooms. The verbal comment rooms collectively held up to 850 persons. In addition, 23 people submitted individual verbal comments to staff members and there were 147 written comments. Vancouver meeting attendees identified a wide range of potential environmental impacts on evaluate in the EIS, including air quality, water quality, human health, economic, and transportation impacts. Environmental impacts on the Columbia River Gorge and neighboring communities were commonly listed. Specific areas of interest and concern included impacts on wildlife, particularly salmon and other fish species, tourism industries, and water and air quality.

The effects of coal dust and diesel emissions on air quality, as well as the resulting adverse impacts on human health, were among the most prominent themes. Many comments identified global warming as a core issue and urged the Co-Lead Agencies to conduct a programmatic or an area-wide evaluation of the cumulative environmental effects of all of the proposed terminal facilities in Washington and Oregon.

Comments also addressed increased rail traffic through Vancouver and dozens of communities along the rail lines as a potentially significant impact on adjacent community residents. These comments frequently identified impacts on property value, strain on local transportation systems, and emergency responder access as key issues to consider in the EIS.

A handful of comments collected at the Vancouver meeting indicated support for the proposal, citing economic growth and job creation as primary benefits.

3.1.7 Seattle

The Seattle meeting was held on Thursday, December 13, 2012, from 4 to 7 p.m. at the Washington State Convention Center. There were 165 public verbal comments made at the meeting in two large rooms. Each of the verbal comment rooms held up to 1,000 attendees. In addition to those who gave verbal comments publicly, 44 people submitted individual verbal comments to staff members and there were 345 written comments.

The overwhelming majority of comments submitted at the Seattle meeting expressed concern about the global impacts of exporting coal to China. Many requested that the EIS consider global warming, climate change, and the potential for airborne pollution to blow from Asia to the West Coast of the United States. The majority of comments urged the Co-Lead Agencies to study the full range of cumulative effects and that the scope of the EIS include the rail route, terminal site, and shipping lanes where coal would be transported from Cherry Point to Asia. Potential impacts on human health were among the most prominent concerns in Seattle, and several commenters requested a health impact assessment. Comments expressed concern over increased rail traffic through communities in Seattle (such as Ballard) and other Washington communities. Safety and fugitive coal dust were also listed as concerns.

Overall, comments indicated concern for global warming, support for clean energy alternatives to coal and moral opposition to exporting coal to China. Other comments mentioned specific concerns about potential impacts on the City of Seattle from increased rail traffic, including economic impacts on waterfront businesses, air quality, transportation impacts on vehicles and users of multiuse trails such as the Elliott Bay and Burke Gilman trails, and a negative impact on property values along railroad tracks.

While a minority of overall comments at the Seattle meeting, many people expressed verbal and written support for the proposal. Supporters cited economic benefits, tax revenue, and job creation as key factors. Most of these individuals identified themselves as railroad workers, union members, and members of labor organizations.

3.2 Agency scoping meetings

An Agency Scoping meeting was held on November 9, 2012 from 9 a.m. to 11 a.m. as a video conference in three Washington Department of Ecology offices: Bellevue, Bellingham, and Lacey. Invitations were emailed by the Co-Lead Agencies to federal and state agencies with expertise as well as local agencies within Whatcom County. The meeting agenda covered a review of who the Co-Lead Agencies are and why they are engaged in leading the EIS process. The meeting provided an overview of the proposals, the EIS process, themes from the scoping process recorded up through November and, where applicable, studies from the Applicants that could be obtained.



At the December 13 Seattle public meeting, there was visible group opposition to the proposals.



The Seattle meeting was held at the Washington State Convention Center. Each of the verbal comment rooms held up to 1,000 attendees.

The objectives of the meeting included providing clarity on agency roles with regard to NEPA and SEPA responsibilities and direction on comment submittals that would be most beneficial to the Co-Lead Agencies in preparing the EIS. The Co-Lead Agencies explained that they would seek input from the regulatory agencies and represented Native American Tribes on their areas of expertise. The Co-Lead Agencies requested input on what the agencies would like to see studied, including the methodologies that would be most helpful in determining impacts and, finally, if the agencies had suggestions on potential mitigation measures that should be considered. The meeting provided time for questions and clarifications on the proposals, status of existing and promised data available from the applicant, and information about the EIS process.

Comments were not collected at these meetings; however, attendees were encouraged to submit written comments from their respective agency.



4. Comments on proposed purpose statement

A number of individuals and representatives of organizations provided input on the applicants' proposed Purpose and Need statements as presented in the Project Information Document (PID). This document is part of the development application to Whatcom County. Several acknowledged how important the purpose and need statement is in the development of a broad range of alternatives, quoting how NEPA requires federal agencies to "rigorously explore and objectively evaluate all reasonable alternatives" to a proposed action [40 CFR 1502.14(a)]. Several expressed doubt that the demand was well justified and requested that each of the issues be supported with more detail. Several expressed doubt that the purpose was honest in depicting the intention of the project. Specifically, several questioned the intentions of terms like 'dry bulk commodities', further interpreting that this was a guise for what was intended to be more specifically a terminal to export coal. Similarly, they questioned the statement that this facility would be used for importing, since the PID does not describe what materials would be imported, from where and for what need. The same commenters requested that the Corps develop a purpose statement that would open the alternatives to allow for the exportation of dry goods and preclude the possibility of exporting coal. Additionally, they request that the purpose statement consider the economic development, employment, and environmental needs of Whatcom County, the region, and for the global climate. Commenters further critiqued the statement "to meet international and domestic demand," stating that they did not feel that exporting coal would meet any domestic demand.

Several other portions of the need descriptions were questioned. Doubts were raised about the following phrases: "the need for deep-water, bulk marine terminals in the Puget Sound region"; "the need for community and economic development in Whatcom County"; "existing and future market demands . . . current and forecasted Pacific Rim demand . . . forecasted growth in trade"; "the proposed project would help to support . . . the Governor's 6-point Export Plan (office of the Governor, 2010)"; and "the terminal is consistent with the goals of the [Washington State Department of Natural Resources'] WDNR's Cherry Point Aquatic Reserve designation for the area and with the

40 CFR 1502.13 NEPA Purpose Statement

The NEPA purpose statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives, including the proposed action.

Reserve's Management Plan, which specifically allows this proposed development." The commenters questioned the validity of these statements and emphasized that there are more important policies that should be incorporated in to the purpose and needs directing the use of this site. A few would like to see more emphasis on the agri-food sector potential to export, referencing a strong growth in this sector and something that could benefit the larger state of Washington to support job growth beyond the port operations.

One commenter stated, "If China will get coal from elsewhere, then there is no need for this project . . ." but if China needs the coal, then ". . . the EIS must consider the effects of China burning coal." A few commenters expressed concern that there was not enough justification on how a previous site plan to support exporting 10 million metric tons of coal has evolved into 54 million metric tons. Others felt that the purpose and need statement for the Custer Spur proposal needs to include a more expansive review of rail capacity constraints along the Bellingham subdivision mainline referring to the proposal's doubling of train traffic along this line.



5. Public comments summarized by issue of concern

The third-party consultants to the Co-Lead Agencies reviewed every comment submitted during the scoping process. The reviewers distilled and compiled the comments according to resource topic and/or issues of concern. The comments were then grouped and summarized herein. This summary will be used for consideration in the development of EIS studies. In addition, comments with details too specific to include in the summary or those that attached technical reports were sent directly to the topic specialists for review and consideration.

The approximately 125,000 comments received during the scoping period reflected a wide variety of scoping requests, perspectives, issues of concern, and ideas. Many respondents expressed similar issues of concern but with unique details and varying degrees of specificity, and it should be noted that in many cases the summaries do not provide the specific details unique to each of these comments nor do they reflect the positive or negative expression or degree of intensity, even if the specific supporting comments exhibited such expression. For this reason the original scoping comments have been included in Appendix G, available only on DVD and online at www.eisgatewaypacificwa.gov. Additionally, the issues were not weighted based on the number of commenters, as all comments were reviewed and summarized in the same fashion.

Other than expressing opposition or support for the proposals, generally, comments fit into one or more of the 20 environmental resource topics listed below or suggested alternatives that should be studied (see Section 8.o). Additionally many people requested specific areas be studied, from towns along the rail line, to several other states including Montana, Idaho, Oregon, and Wyoming, all the way to studying impacts in China. These requests are being reviewed by the co-leads while they determine the scope of the EIS. The sections below provide summaries of the comments received during the scoping period. Commenters also suggested mitigation measures for certain resource topics, which are listed at the conclusion of their respective sections. The views articulated are the views as provided via public or stakeholder comments. ***The scoping comment statements are portrayed as they have been provided. The viewpoints are reported as***

Scoping Comments

The approximately 125,000 comments received during the scoping period reflected a wide variety of scoping requests, perspectives, issues of concern and ideas.

The original scoping comments have been included in Appendix G, available via the EIS website: www.eisgatewaypacificwa.gov.

opinions, not factual information, nor do they represent what will actually be studied in the EIS. All comments are under review by the Co-Lead Agencies to help inform the breadth and range of considerations in the EIS.

5.1 Geology and soils

- Geologic risks on the terminal site and along rail corridors and roadways** – Evaluate the geological impacts for construction of the terminal site and along the coastal rail corridor and the State Route (SR) 9 rail corridor, as well as any other alternative interior rail corridor that might be considered for the proposals. Consider the geologic impacts and risks associated with the Boulder Creek fault zone and unstable/soft road beds under train tracks. Evaluate the potential for landslides/erosion/rock slides along Eldridge Avenue, Chuckanut Drive, Bellingham Bay sand bank, Samish Bay, and other areas. Evaluate the stability of abandoned mine shafts along Eldridge Avenue bluff.
- Liquefaction and mudslide risks**– Consider the liquefaction risks and consequences of soils and mudslides between Seattle and Marysville. Evaluate the potential for landslides on steep slopes, including increased risk during rainy season, and how potential slides may affect rail traffic, especially Sound Transit commuter rail and Amtrak. Analyze changes in liquefaction potential as a result of vibration from the additional train traffic. Evaluate the potential for subsidence from vibration and the effect on gas pipelines (natural gas, butane) parallel to or under tracks (see Noise and Vibration section).
- Alternate rail routes as a result of landslides** – Include discussion of alternative routes that may be used when the rail is closed due to a slide and identify where coal trains would sit while the track is cleared after a landslide or other event. Discuss whether the inland Stevens Pass alignment would be used if the Columbia River/shoreline route were closed.
- Drainage/landslide prevention design and costs**– Address concerns about the cost and financial responsibility of implementing drainage-control measures in slide-prone track areas to prevent impacts from landslides between Seattle and Everett, as well as a 15-mile stretch south of downtown Bellingham that was identified as a sensitive area for landslides. Evaluate the effect on federal emergency storm repair program as well as state and city financial responsibility to maintain vulnerable structures/infrastructure. Evaluate drainage-control relative to risk of having railcars pushed into the bay between Seattle and Everett, as well as a 15-mile stretch south of downtown Bellingham that was identified a sensitive area for landslides. Discuss whether a levy should be charged on freight to fund continuous rail bed

Geology and soils

Comments were grouped as follows:

- Geologic risks on the terminal site and along rail corridors and roadways
- Liquefaction and mudslide risks
- Alternate rail routes as a result of landslides
- Drainage/landslide prevention design and costs

See also comments in Section 5.2 Air, 5.5 Wetlands, 5.6 Terrestrial wildlife and vegetation, 5.9 Hazards and risks, 5.10 Land use, shoreline and recreation, 5.15 Social, and 5.19 Human health



"It would seem that dramatically increased coal-train traffic on this line would increase the likelihood of mudslides resulting in rail accidents and the spilling of large amounts of coal into the environment, including the marine environment."

– Commenter Paul Blum, Comment #5986

(Photo of mudslide courtesy of WSDOT.)

maintenance. Provide mitigation for slide-vulnerable areas along track in Bellingham.

5.2 Air

- Diesel emissions, toxins, and other pollutants**– Address concerns about the amounts of toxins, including acetaldehyde, benzene, 1,3-butadiene, formaldehyde, polycyclic hydrocarbons, and PM_{2.5} (particulate matter [fine particles] less than 2.5 micrometers in diameter), aggregated over the life-span of the operation, and the cumulative impacts on human populations over the proposals’ lifespan. Study nitrogen dioxide (NO₂) emissions in Bellingham and other coastal communities, as well as anywhere else along the railroad lines that have valleys or are sheltered by mountains. Estimate and analyze the increase of criteria air contaminants (ground-level ozone, carbon monoxide, sulfur oxides, nitrogen oxides, and lead) from vehicles idling while waiting for trains to pass and evaluate the impact on the air quality of Bellingham and Whatcom County. Identify air sensitive receivers within a mile of the rail corridor, including the number of businesses affected Update air quality analysis methodology to address mobile sources emissions, line sources, and use of mobile monitoring; unregulated, combustion-related species such as ultrafine particles (UFP), which can cross the blood-brain barrier and penetrate cell walls; unregulated pollutants such as diesel exhaust particulate (DEP), ultrafine particles, heavy metals, and polycyclic aromatic hydrocarbons (PAH); and exposure of downwind human populations to regulated and unregulated air pollutants within 3 kilometers of the rail lines.
- Impacts in the U.S. and other areas as a result of coal burning in Asia** – Address concerns that air pollution from China and Asia would reach and affect the Pacific Northwest. Address concerns that the coal being exported is of low quality that cannot be burned in the US, but that the pollution would come back to us when the coal is burned in China. Address concern about cadmium from burning coal in Asia blowing back to the Pacific Northwest. Evaluate impacts on human health, vegetation, and wildlife caused by the trade winds returning toxins to the Pacific Northwest. Quantify air pollution effects in China and determine how long it takes for pollution from China to reach the Pacific Northwest. Address concerns that the proposals would drop pollutants in Northern California. Evaluate air quality along the entire west coast of the US, including pollution from ships’ exhaust. Evaluate how much coal smoke/ash travels to the northern ice sheet when burned in Asia, and what kind of contribution it makes to the melting of ice once it settles. How, where, and at what concentration these pollutants might affect Hawaii, Alaska, the Pacific Ocean, Puget Sound, Skagit County, eastern Washington, and the greater Pacific Northwest. Assess the effects of these pollutants on humans,

Air
<p>Comments were grouped as follows:</p> <ul style="list-style-type: none"> ■ Diesel emissions, toxins and other pollutants ■ Impacts in the U.S. and other areas as result of coal burning in Asia ■ Effects on local and regional residents, schools, national parks and the San Juan Islands, ■ Impacts of coal dust from trains and during the transfer process ■ Study wind-blown dust from stockpiles and trains ■ Air quality standards, compliance and monitoring ■ Mitigation measures <p><i>See also comments in Section 5.3 Energy/greenhouse gases, 5.6 Terrestrial wildlife and vegetation, 5.9 Hazards and risks, 5.15 Social, 5.16 Economics, 5.17 Visual resources, 5.19 Human health, and 5.20 Cumulative effects</i></p>



Many commenters expressed concern about the possible release of coal dust along the rail route.

wildlife, salmon, and vegetation. Address concerns that air pollution from China and Asia would reach and affect the Pacific Northwest.

- Effects on local and regional residents, including schools, national parks, and the San Juan Islands** – Address concerns that the distribution of diesel emissions and exhaust from trains and vessels and from the terminal site would affect air quality and smell. Evaluate potential increase in smog. Evaluate effects of cars and trucks idling, and diesel exhaust or coal dust emission, on Lincoln Elementary in Mount Vernon, public schools in Lewis County (Bennett, Cascade, Olympic Elementary, Chehalis Middle School, and Chehalis High School), and on nearby residents. Study high-efficiency diesel, hybrid, electric, and natural gas engines, including potential capital and operating costs. Request BNSF to fund a scientifically rigorous study on the impacts of coal dust and coal train diesel fumes on local and regional populations. Study the temperature inversions in the Columbia Gorge. Estimate air-pollutant concentrations under normal and poor air-mixing conditions, such as temperature inversions. Quantify diesel particulate matter from idling trains at Spokane rail yard due to the increased rail yard activities and train traffic and conduct dispersion modeling to assess impacts on nearby receptors. Address concern that the BNSF non-idling agreement in Seattle is not enforced.
- Impacts of coal dust from trains and during transfer process** – Study coal dust migration caused by trains, in combination with winds blowing from storage areas, releasing coal dust, coal fly ash, and coal fly ash slurry. Explain how coal transfer points (rail to terminal and terminal to ship) would work and the potential for dust to escape. Investigate whether or not loading the trains would create coal dust, because the coal would be wetted down when it is loaded onto trains. Research the aerodynamic effect of train tunnels on pulling coal dust from train. Investigate what would happen if cars are covered: would dust escape out the sides or bottom of the cars? Discuss whether coal dust sealant spray would be less effective because the coal would be jostled on the train. Address concerns that surfactants on loaded cars would not effectively reduce coal dust dispersion because of train vibration causing the surfactant to sink toward the bottom of rail cars. Assess the cost, per ton of coal, of covering cars. Analyze loading and unloading procedures, including the automated nozzle system that SSA Marine is proposing to use for loading. Compare the cost of using covered stockpiles such as sheds or silos with using open coal stockpiles with wind abatement walls. Quantify how much coal dust would be released per train, considering wind, landslide-induced derailment, and spillage. Determine if there will be coal dust damage to car engines, airplane engines or mechanical devices such as traffic lights, and on switches, valves and other refinery equipment and structures used by adjacent industries.



The San Juan Islands was identified as an area that could be impacted by diesel emissions from vessels.

(Photo courtesy of Allen Sheffield)



"Please study the impact on our shoreline of a coal and/or oil spill during loading or transport."

*– Commenter Cynthia Franklin
(comment #8031)*

(Photo courtesv of Jon Konra)



An increase in shipping traffic and potential effects on beaches and shoreline were issues at multiple scoping comment meetings.

Determine which communities along the entire rail route may experience the greatest volume and impact of coal dust emissions from just the GPT trains and include the combined effect of all coal trains traveling to and from other proposed Washington and Oregon coal ports. Consider the unique geographic and weather conditions in the Columbia Gorge that could exacerbate impacts. Quantify coal dust in pounds released, distance of dispersal, and distribution fan.

- Wind-blown dust from stockpiles and from trains**– Evaluate wind-blown coal dust from stockpiles and the effect on business relying on cleanliness, especially on outdoor equipment. Research what happens to the coal dust at the existing Tsawwassen plant/terminal. Provide specific effects and mitigation for their operation including wind walls, fencing, and tree buffers to minimize emissions from stockpiles. Determine if there would be more coal dust emissions during water shortages. Address concerns about dirt, debris, and soot on property near the stockpiles or along the train route. Study wind patterns at the site and their effect on coal dust. Determine if particles settle in areas and then get picked up again by the wind, traveling even farther. Determine the distance coal dust can travel under various circumstances. Analyze characteristics of fugitive coal dust and potential for windblown particulates, compared to smoke. Address the potential effects of coal dust related to the wind turbines, which have been newly authorized by the Whatcom County Council, on adjacent land in the industrial zone at Cherry Point.
- Air quality standards, compliance, and monitoring** – Concern about diesel particulate matter and compliance with National Ambient Air Quality Standards (NAAQS) and conformity with the Washington State Implementation Plan (SIP) for PM₁₀ (particulate matter less than 10 micrometers in diameter) and carbon monoxide (CO) in Spokane County. Address consistency with the federal Clean Air Act (CAA) Section 112 (issuance of technology-based standards for major sources and certain area sources) and the ability of trains in Washington to meet Tier 4 standards. Address concern regarding consistency with the new 2011 U.S. Environmental Protection Agency (EPA) emission standards for large US-flagged ships and consistency with the intent of Section 112 of Clean Air Act, including emissions from locomotives and cape size bulk carrier ships. Address concerns about EPA's proposed new limit on particulates. Consider the EPA standard for soot emissions from December 2012. Move beyond traditional NAAQS compliance monitoring methods. Assess indoor exposures as well as outdoor air pollution and populations living, schooling or working within the downwind plumes of GPT-related diesel locomotives. Quantitatively determine with high spatial resolution the extent and impacts of both regulated and unregulated emissions (for example, DEP and UFP) at, adjacent to, and



"Under such extremely windy conditions, it is difficult if not impossible to see how coal dust from terminal operations and open storage piles can be fully contained on site."

– Commenter Dr. Michael Riordan
(Comment #7362)
(Photo courtesy of Lars Ploughmann)



Commenters identified the need to monitor environmental releases at the proposal site

downwind of the GPT from all combustion sources associated with the proposed facility, with particular attention to the health impacts on adjacent and nearby communities. Document the cost of funding National Oceanic and Atmospheric Administration (NOAA) or other atmospheric monitoring organizations to provide real-time information about the number of airborne particulates around the proposals' study area. Address how the proposals would affect Seattle's ability to meet clean air standards and whether the proposals would meet the new annual standard for permissible soot particle emissions. Assess the capacity of the Northwest Clean Air Agency to monitor the risks and environmental releases from the proposed facility given its current monitoring demands and record of industrial enforcement. Evaluate the need for additional air-monitoring stations in San Juan County. Assess the increased need for and cost recovery options for improved localized and mobile air quality monitoring systems.

Mitigation measures

- Fully enclose coal cars and use surfactants to contain coal dust, especially in a derailment. Spray surfactants on empty coal cars to prevent the dispersion of loose particles and on coal piles before they are loaded on the train. Line rail cars to ensure that dust does not leak from the bottom and use a durable synthetic or metal cover. Use a locking cover similar to what garbage dumpsters use that unlocks automatically when the container is inverted. Include particulate filters.
- Construct a tunnel along parts of or the entire route to minimize impacts of coal dust on surrounding communities and natural resources. Consider the feasibility of providing bases along the route at regular intervals, which would provide weather-protected space for trains to prevent loss of coal dust if the route ahead is impeded due to mudslides or other unforeseen reasons. Weigh cars at several points during journey to measure loss. BNSF should mitigate dust concerns by cleaning the walkways under the viaducts.
- Prohibit unloading of coal from train cars or loading into cargo ships during periods of high winds. Consider mandating stricter operating procedures to minimize the level of coal dust loss, including regular equipment inspections and servicing, suspending coal loading, and closing ship hatches to prevent losses in high winds. Create a fully enclosed on-site coal storage area. Implement independent monitoring of coal dust around the terminal and in surrounding neighborhoods. Establish air quality thresholds for coal dust at a minimum of two locations at the facility and three locations within Bellingham and report quarterly. Get guarantees regarding no fugitive coal dust. Port of Amsterdam, LBH/Rietlanden produces almost no dust—use what they are using. Use wind walls to minimize emissions from stockpiles.



Commenters suggested that stricter operating procedures be mandated to minimize the level of coal dust loss. (Photo courtesy of Grey Goebel)

- Consider reducing diesel emissions from shipping vessels by equipping boats with smokestack scrubbers and using shoreside electric power or cold-ironing to reduce idling at the terminal.
- Implement strict standards for emissions from diesel engines in trains and ships, such as EPA Tier 3 or 4 standards. Consider use of cleaners to trap and neutralize pollutants from fossil fuels. Require best available technology for emission control.
- Consider minimizing train idling, especially near populated areas. Trains should shut off their engines after idling for five minutes. Consider a mandate for trains to plug into electrical power grids instead of idling when parked on side rails. Consider use of idle-reduction technology for locomotives and relocation of rail yards outside of air stagnation zones. Monitor air quality downwind of the tracks by an authority that is responsible to the public.
- Consider mitigation for impacts in China and making China financially responsible for safe shipment of coal from extraction to delivery. If necessary, work with Australia to help the U.S. pressure China to accept higher prices, more stringent “clean coal” standards and better working conditions for their citizens. State of Washington should set up agreements that any plant that would burn coal that passes through a port of the state be compelled by agreements and statute to only burn such coal in plants that meet the same air quality standards that would be enforced here at home. Only allow coal to be shipped to locations that have stringent environmental controls in place.

5.3 Energy/greenhouse gases

- **Energy loss during the transport of coal** – Ascertain how much real energy is lost between Powder River Basin and China—by the time the coal is mined and transported all the way to China, some estimates are that 50 percent of the energy that could be generated here in the United States is lost. Make a comprehensive and thorough study of the lost energy and how it relates to the devastating effect that transporting this coal over such distance will have on the environment, more pollution, and climate change.
- **Acid rain** – Describe the potential for acid rain and investigate and describe how the expected acid rain might affect water quality, agriculture, and human health. Evaluate the effect of ocean acidification on currents and the related costs. Consider that global warming and ocean acidification can lead to extinction of life on earth. Investigate whether the potential pollution drifting from overseas might violate any federal or state laws for water quality or chemical pollution.
- **Extreme weather and rising sea levels** – Study how changes in weather and rainfall could affect the Pacific Northwest timber industry and local farming. Consider the potential for increased



"The EIS must address the global impacts of exporting coal to be used in Chinese power plants."

– Commenter Steven Hahn
(Comment #11993)
(Photo courtesy of Peggy Davis)

Energy/greenhouse gases

Comments were grouped as follows:

- Energy loss during the transport of coal
- Acid rain
- Extreme weather and rising sea levels
- Global impacts over a long period of time
- Human health and way of life
- Burning of coal compared to a no build or to other energy sources
- International agreements and local codes and priorities
- Costs to address global warming
- Mitigation measures

See also comments in Section 5.3 Energy/greenhouse gases; 5.4 Water resources; 5.5 Wetlands; 5.6 Terrestrial wildlife and vegetation; 5.7 Aquatic resources; 5.9 Hazards and risks; 5.1 Land use, shoreline and recreation; 5.13 Transportation; 5.14 Vessel traffic; 5.15 Social; 5.18 Economics; 5.19 Human health; and 5.20 Cumulative Effects.

storms on the west coast and how these storms would impact infrastructure, including Seattle bus tunnel and sea wall. Include the delta areas of the Skagit and Nooksack rivers in Skagit and Whatcom counties, as well as the shorelines of Birch Bay, Drayton Harbor, the Chuckanut Reach, and Padilla Bay, which will be dramatically affected by rising sea levels. Study the effects of rising sea levels in Florida and Manhattan.

- **Global impacts over a long period of time** – Study the impacts globally, including the potential for worldwide biodiversity losses, such as coral reefs. Study impacts on habitat and species loss, polar bears, and coral reef bleaching. Analyze global warming impacts over several centuries in the future: on food insecurity; loss of life; global water cycle; surface water resources; on local, regional, national and global economies, and employment; on habitat and species from bacteria to large mammals; and on coral reef bleaching.
- **Human health and way of life** – Consider the impacts on quality of life and health, including thermal stress from heat waves, degradation of air quality, infectious, and chronic diseases, extreme weather events water accessibility, employment, habitat, diseases, extreme weather, coral reef bleaching, and the effect on public safety, and psychological stress, social disruption, and economic disparities. Study impacts on food insecurity, loss of life, global water cycle (changes in ocean temperature), and surface water resources. Study impacts on populations like Bangladesh, the Maldives, and Alaska native villages.
- **Burning of coal compared to a no-build or to other energy sources** – Consider the impact of Asia purchasing dirtier coal from another country if the proposals are not built. Evaluate the burning of Powder River Basin coal and compare the greenhouse gases produced to other fossil fuel commonly used for electricity production.
- **International agreements and local codes and priorities** – Evaluate the consistency of the GPT proposal with the Copenhagen Agreement, Revised Code of Washington (RCW) 70.235.070(1)(a) and other Washington state policies, as well as residents' values and priorities. Evaluate how the GPT proposal may delay the adoption of renewable energy technologies and converting to cleaner energies. Study ways for the U.S. to export technical knowledge and expertise, as well as policy regulations targeting increased energy efficiency and renewable electricity, to Asia to promote greater sustainability practices. The GPT proposal should require receiving countries to use best available technology to control carbon dioxide emissions. Study ways for the U.S. to encourage foreign coal users to self-determine and self-supply energy sources and practice energy conservation, rather than



Commenters asked that the EIS study impacts globally, including the potential for worldwide biodiversity losses, such as coral reefs.

(Photo courtesy of NASA Goddard Photo and Video)



Commenters suggested that the EIS evaluate the impact of Asia purchasing dirtier coal from another country if the proposals are not built

(Photo courtesy of Egor Grebney)

harming our environment and landscape to temporarily satisfy their energy needs.

- **Costs to address global warming** – Evaluate the costs of mitigating impacts associated with global warming. What are the costs to address sea level rise (infrastructure upgrades, waterfront damages, pollution cleanup from damage to sewer systems, etc.). Evaluate mitigation measures to minimize greenhouse gas emissions, including the possibility of the proponent investing in carbon sequestration to offset all GPT proposal emissions. Evaluate contribution by the proponent to a specific carbon tax fund. Investigate whether adverse effects stemming from coal burning, either within Asia or in the U.S. (due to windblown particles originating in Asia), can be remediated or if compensation can be provided.

5.4 Water resources

- **Ship coating, vessel emissions, and ballast**– Address concerns that anti-fouling coating applied to the hull of marine vessels could have impacts on water quality. Evaluate impacts of release of toxic metals from chipping, abrading or dissolving hull paints, which are used to slow the growth of organisms that attach to the hull and can affect the vessel’s performance and durability. Evaluate vessel emissions and the effect on surface water quality in the Puget Sound. Study requirements related to vessel discharges of ballast water and of holding tank (different than ballast) and evaluate monitoring that would be used to enforce violation of waste discharge. Address the penalty for violation of waste discharge regulations.
- **Acid rain** – Address concerns that emissions from coal dust would contribute to increased acid rain, which causes acidification of lakes and streams and contributes to damage of plant and animal ecosystems due to changes in pH and aluminum levels in aquatic environments. Address concerns related to eutrophication of ecosystems, which can occur when harmful substances are added to an aquatic system and in which oxygen-producing bacteria that live in oceans may not survive, reducing other animal populations. Address concerns that acid rain also accelerates decay of building materials and paints. Address concerns about the impacts associated with black carbon and mercury derived from fuel emissions and coal dust. The release of black carbon in the atmosphere would affect winter snow pack development and the rate of melting in the spring and summer, which would have associated impacts on Tribal fishing, available water supply, and tourism and recreation. Address concerns about the impacts of providing cheap coal to China that would harm our ecosystem. Describe how water pollutants derived from coal burning in Asia would travel to the Pacific Northwest.

Water resources

Comments were grouped as follows:

- Ship coating, vessel emissions, and ballast
- Acid rain
- Groundwater and drinking water
- Streams rivers and other waters
- Stormwater and wastewater management
- Water quality impacts from mining
- Water quality impacts from train operations
- Wave action from vessels and the pier and wharf
- Water supply and demand
- Mitigation measures

See also comments in Section 5.2 Air, 5.3 Energy/greenhouse gases, 5.5 Wetlands, 5.6 Terrestrial wildlife and vegetation, 5.7 Aquatic resources, 5.8 Noise and vibration, 5.9 Hazards and risks, 5.10 Land use, shoreline and recreation, 5.11 Tribes, including Indian fishing and fishing treaty rights, 5.14 Vessel Traffic, 5.15 Social, and 5.19 Human health.

- **Groundwater and drinking water quality** – Discuss concerns that coal dust escaping from rail cars or from stored coal would be absorbed by and contaminate groundwater aquifers and other drinking water sources, including in communities along the rail line such as Spokane. Evaluate impact of coal mining on groundwater aquifer water quality near extraction sites, including released coal dust. Analyze impacts related to removal of coal in the earth that naturally filters groundwater before it enters aquifers. Address concerns about the impacts from coal dust runoff into nearby watersheds and estuaries and the associated harm to aquatic habitat, which can affect a large percentage of the area’s drinking water sources. Address the following specific locations:
 - Chuckanut Bay
 - Lake Whatcom
 - Nooksack River
 - Puget Sound
 - Samish Bay
 - Skagit River
- **Streams, rivers, and other waters** – Disclose the impacts of coal dust and diesel particulate matter on freshwater streams and rivers, aquifers, and coastal saltwater. Document impacts during deposit, suspension, integration, and final dilution of coal particles in water. Quantify, during normal operation and in the event of spills, the amount of coal contaminating these resources, including distribution and toxicity impacts. Address concerns that water from misting systems would drain off of the coal piles and train cars loaded with coal as polluted water and would degrade the coastline. Evaluate effects of a train spilling hazardous cargo and the impact on water quality.
- **Stormwater and wastewater management** – Evaluate the impact on stormwater and wastewater management and the method that would be used to treat and dispose of waste materials. Address whether the storage facility be lined or unlined; if lined, how will the captured water be treated or recycled? If unlined, what types of pollutants will get into the ground water? Address whether the treatment facilities be able to handle excessive rain water. Consider that the railroad bed would worsen flooding, resulting in winter ice dams. Consider the economic effects of flooding and ice dams.
- **Water quality impacts from mining** – Analyze the impact of gravel and silt runoff on water quality aquatic ecosystems, because coal extraction procedures, such as mountaintop removal, generate tons of debris that are dumped into adjacent valleys and block natural stream paths, increasing runoff and water turbidity.
- **Water quality impacts from train operations** – Evaluate water quality impacts due to normal train operation, including brake dust emitted from trains, track lubricants, and herbicide spraying to



Commenters were concerned about the effect of leachate on water quality (Photo courtesy of David Pickersgill)



Commenters requested that impacts of coal dust and diesel particulate matter on freshwater streams and rivers be studied.



"The EIS should address specifically how runoff from terminal operations will be captured and how design of the terminal will ensure all runoff containing sediment is treated."

– Commenter Terry Wechsler (Comment#9702)

control weeds along tracks. Address concerns about contamination from the use of surfactants, which are sprayed on coal cars to reduce the spread of coal dust and may increase the mobility of pollutants in aquatic environments, in conjunction with coal transport. Address concerns regarding firefighting agents used to control coal fires and include surfactants and solvents, many of which are known to cause environmental impacts. Evaluate the effect of leachate on water quality (leachate is polluted rainwater that has percolated through both loaded and empty coal cars). Leachate samples should be collected for lab testing.

- Concerns related to wave action from vessels and the pier and wharf** – Address concerns that the size of shipping vessels would affect the ocean floor, including impact of dredging at ports to accommodate large cargo boats or the creation of divots in sediment layers. Evaluate the impacts of wave and wake action from tankers and attending vessels on the shoreline. Analyze scouring, erosion, substrate deposition disturbance, turbidity, and depth modifications and the impacts on spawning and forage substrates; analyze specifically the short- and long-term impacts on the specialized features of our many pocket beaches and characteristic red substrates. Analyze the effects of alteration of wave and wind motion from pier and wharf.
- Water supply and demand** – Evaluate the availability of water in the area, including the Nooksack River, to meet demand for controlling coal dusts, and fires. Address concerns about the worldwide availability of fresh water, including all water used, from mining to shipping. Discuss how water is wasted on spraying coal and should be used instead for agriculture, to preserve in-stream flows and to resupply hydraulic wells. Study existing capacity and the proposed water use at the proposal site and how it would affect availability of water for future development of additional housing, farming, or other commercial industries. Evaluate re-use of water used to clean rail cars or its use in a closed system. Address suggestions to re-use or reclaim water during operations. Consider using saltwater pumped from the terminal site to water down coal and for other needs.

Mitigation measures

- Enclose and seal cargo ships during and after loading to reduce the risk of coal dust leaking from boats. Use double-hulled ships to further reduce coal dust leaking from boats. Use “American Bottoms” vessels. Regularly monitor vessels for adherence to identified safety and environmental standards, including observing the 10 knots speed rule and reporting the method for how onboard toilets are flushed for ships entering Puget Sound.
- Restrict shipping routes for coal vessels, including specifically avoiding shipping routes near the San Juan Islands.



Commenters suggested that there be frequent inspections and monitoring of the water table, as well as in watersheds and intertidal zones that the railroad tracks pass through.



Commenters asked that the EIS evaluate the impacts of wave and wake action from tankers and attending vessels on the shoreline.

- Create rules for disposing ballast water from ships, which can pose public health and environmental risks; these rules can include restrictions on dumping ballast water during periods of inclement weather or complete restriction of dumping at sea. Pump water into tanks on land and treat with heat, ultraviolet radiation, or chemicals to drinking water standards.
- Capture coal dust before it enters the sea or offset contamination by improving the local stormwater management system. Add filtration to the existing stormwater outlets that drain directly into sea, such as in Bellingham Bay.
- Frequently inspect and monitor the levels of coal and other toxins absorbed into the water table, as well as in watersheds and intertidal zones that the railroad tracks pass through.
- Observe the seabed for impacts from coal transport, such as in Haro Strait.
- Evaluate water quality using the model developed for the Puget Sound Georgia Basin by the Washington Department of Ecology and EPA.
- Use tightlines and other methods to remove water from the clay slip-layer along all bluffs on the coastline.
- Evaluate the feasibility of mitigating of wave and wake action from tankers and attending vessels on the shoreline.
- Use catchment system wherein the train operator can collect water below each car and dispose of it at a single location.
- The dock should include the capability to collect and treat ballast water.



Commenters stated that the wetland study address compliance with Executive Order 11990, Protection of Wetlands.

5.5 Wetlands

- **Wetland impacts from construction and operation of the proposal** – Evaluate impacts on wetlands from grading, filling, and cutting during construction. Evaluate impacts during operation from water used for dust suppression and the potential to drain wetlands and estuaries in the Puget Sound region.
- **Wetland impacts along the rail route** – Evaluate the geological impacts caused by coal trains’ weight and vibrations on wetlands near the rail tracks and consider impacts from derailment. Consider impacts on wetlands from the loss of coal dust to surrounding water bodies and pollution impacts on wetlands. What impacts will coal dust, transport pollutants (like diesel), heavy metals, and habitat loss have on sensitive wetlands, salt marshes, and the species these biodiverse habitats support?
- **Wetland impacts beyond the project site-** Evaluate wetlands areas within 5 miles of GPT proposal site, along Custer Spur, near train tracks along the entire route and in other areas including the

Wetlands
Comments were grouped as follows:
■ Wetland impacts from construction and operation of the proposal
■ Wetland impacts along the rail route
■ Wetland impacts beyond the project site
■ Other wetlands concerns

Auburn Environmental Park (wetlands), impacts on an existing Washington State Department of Transportation (WSDOT) wetland mitigation site for the SR 548 improvements.

- **Other wetland concerns** - The wetland study should take at least one year in order to fully study the distance and rate of coal dust transport under all seasons and weather conditions, and should address compliance with Executive Order 11990, Protection of Wetlands. The EIS should address the illegal cutting of trees and filling of wetlands that already occurred on this site without proper permits by the Applicants. The EIS should evaluate how removal of above-ground habitat in open pit mines affects sensitive habitats in this area, such as wetlands and riparian areas.



"Railroad beds are fertile sites for noxious, invasive weeds and trains are a constant vector for spreading those seeds."

– Commenter Debbie Milburn
(Comment #6266)

5.6 Terrestrial wildlife and vegetation

- **Air and light pollution** – Evaluate the impacts from diesel particulates, coal dust blown from ships and trains and potential oil spills on birds and bird habitat, including seabirds wintering in Puget Sound, the straits, and the San Juan Islands. Address concerns about the accumulation of toxins in soils, including selenium and cadmium toxicity from coal and coal dust. Address concerns about eggs being smothered by coal dust. Evaluate the light effects on birds that feed on bioluminescent plankton.
- **Movement patterns, food, water quality, and breeding needs** – Analyze migration impacts on shorebirds and birds in the Pacific flyway, including the effects on movement patterns, food, water quality and breeding needs of migratory and resident birds such as prairie chickens. Address impacts on specific bird species, including threatened, sensitive, candidate, and monitored bird species; Edmonds Marsh golden eagle; peregrine falcon; seagulls (all types); spotted owls, great blue heron, gray-bellied Brant geese, tufted puffins, ducks, geese, swans, heron, and western and Clarkes grebes, and others. Within a mile of the entire rail corridor, evaluate impacts on movement patterns; food, and breeding needs; wildlife access to food sources and water; and potential for increased deaths from crossing train corridors. Evaluate the impacts from noise, including the noise effects on breeding mammals between Bellingham and the Powder River Basin.
- **Coal dust impacts along the rail corridor** – Evaluate the potential impact that coal dust seepage and drift would have on the photosynthetic performance and carbon dioxide (CO₂) exchange of dominant tree species within a mile of rail track and terminal, including Patos Island, an old-growth forest which has rare and unusual flora and fauna. Identify and study plants along the route that are more susceptible to diesel particulates or are endangered. Study railbeds and the potential for trains to be a vector to spread noxious, invasive weeds. Consider the loss in productivity of riparian ecosystems from Montana to Bellingham and the loss of

Terrestrial wildlife and vegetation
Comments were grouped as follows:
<ul style="list-style-type: none"> ■ Air and light pollution ■ Movement patterns, food, water quality and breeding needs ■ Coal dust impacts along the rail corridor ■ Impacts to wildlife refuges and conservation areas
<p><i>See also comments in Sections 5.7 Aquatic resources, 5.8 Noise and vibration, 5.9 Hazards and risks, 5.10 Land use, shoreline and recreation, 5.11 Tribes, including Indian fishing and fishing treaty rights, 5.17 Visual resources, 5.19 Human health, and 5.20 Cumulative effects.</i></p>

biological diversity of amphibians and insect species along the rail route, including Pacific tree frogs and their predators and prey, bees, and other insects, fungus, eukaryotes, and non-eukaryotes. Evaluate impacts on movement patterns, food, and breeding.

- **Wildlife refuges and conservation areas** – Study the following specific areas of concern: Lake Terrell Wildlife Preserve, priority conservation areas identified by the Skagit Land Trust, California Creek Timberline Preserve, Chuckanut wildlife corridor, Steigerwald National Wildlife Refuge, Ridgefield National Wildlife Refuge, Tongue River Valley, and Umatilla reservation. Address concerns about impacts on the grizzly bear population restoration project in the Yellowstone Recovery Zone; the Northern Continental Divide Recovery Zone; the Selkirk Mountains area of northern Idaho, northeast Washington, and southeast British Columbia; the Cabinet Yaak area of northwest Montana and northern Idaho; Bitterroot (Idaho); and the North Cascades (Washington) Evaluation Areas. Evaluate the impacts on wildlife refuges serving northwest shorebirds, including the priority conservation areas identified by the Skagit Land Trust, the Heron hatchery in Kiwanis Ravine, and the pacific heron populations at Cherry Point.

5.7 Aquatic resources

- Marine ecosystems and habitat– Evaluate the proposals’ effect on the fish and marine life ecosystems of the Salish Sea, San Juan County, Point Whitehorn Marine Reserve, and Cherry Point, Cypress Island, and Fidalgo Bay, which are all Department of Natural Resources aquatic reserves. Investigate Protection Island, Smith and Minor Islands, the estuary of the San Juan Archipelago, and southern Georgia Basin, including the Whatcom County shoreline, subtidal, and benthic habitats. Study the effects in the Bering Sea, Bristol Bay, Aleutian Islands, and Gulf of Alaska. Study the breeding colony of otters on the north side of Patos, which would face Cherry Point. Other areas mentioned include:
 - Cherry Point Aquatic Reserve Chuckanut Bay
 - Chuckanut Mountain (Cascades to Chuckanut Corridor)
 - Columbia River
 - Deschutes River Watershed
 - Duwamish River
 - Edmonds Marsh
 - Forgotten Creek Natural Area and Trail
 - Haro Strait
 - Lake Padden
 - Lake Pend Oreille
 - Lake Terrell
 - Lake Whatcom
 - Latah Creek

Aquatic resources

Comments were grouped as follows:

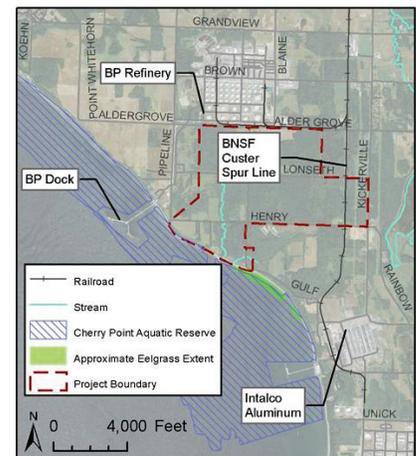
- Marine ecosystems and habitat
- Marine life
- Cherry Point Aquatic Reserve
- Coal dust and other pollution impacts on marine life and shoreline
- Vessel operations and the impact on marine life
- Fish migration and behavior
- Landslides
- Fisheries industry
- Consistency with plans and recovery efforts

See also comments in Sections 5.2 Air, 5.4 Water resources, 5.8 Noise and vibration, 5.9 Hazards and risks, 5.10 Land use, shoreline and recreation, 5.11 Tribes, including Indian fishing and fishing treaty rights, 5.12 Cultural, historical and archaeological resources, 5.14 Vessel Traffic, 5.16 Economics, and 5.19 Human health

- Nisqually Estuary
 - Nisqually River
 - Obstruction Island
 - Padilla Bay
 - Point Whitehorn
 - Puget Sound
 - Rathdrum Prairie
 - Rosario Strait
 - Salish Sea
 - Samish Bay
 - Samish Flats
 - Silver Creek
 - Skagit Delta
 - Skykomish River
 - Tennant Lake
 - Umiak Passage
 - Willapa Bay
 - Yellowstone
- **Marine life** – Evaluate the proposals effect on marine life including but not limited to dolphins, Dungeness crab, copepods (all eight types), amphipods, arthropods, cephalopods, pteropods, golden seal, gunnel, harbor seals, marbled murrelet, surf scoter, minke whales, pygmy right whales, invertebrates, fish (steelhead, trout, bull trout, rockfish, bottom fish, flatfish, cod, pollock, flounder, sole, lingcod, eulachon fish), and pinto abalone (*Haliotis kamtschatkana*). Study the effect on bivalves, particularly manila clams, littleneck clams, butter clams, horse clams, and macomas, and the associated food chain effects. Evaluate how orca reproductive and immune systems would be affected and how noise would affect orca food sources and calving.
 - **Cherry Point Aquatic Reserve** – Analyze effect on Cherry Point Aquatic Reserve, including herring recovery and the herring-salmon-orca food chain. Consider the Cherry Point Herring Behavior Study and study the reasons for the current decline of the Cherry Point herring population. Evaluate impacts on eelgrass, attached macroalgae such as kelps, red algae such as Turkish towel, green algae such as sea lettuce, and, most importantly, Pacific herring spawning beds, as outlined in Washington Administrative Code (WAC) 220-110-300(6). Evaluate impacts of escaping coal dust in the immediate vicinity of the port at Cherry Point Aquatic Reserve.
 - **Coal dust and effects from other pollution on marine life and shoreline** – Study the effect of cadmium, lead, mercury, copper, and arsenic toxicity from coal and coal dust on aquatic life. Evaluate the potential for abrasion, smothering, reduced light, and clogging of respiratory and feeding organs as a result of coal dust and sedimentation. Consider the health and survival of critical



Commenters expressed concern for the marine ecosystems in the area.



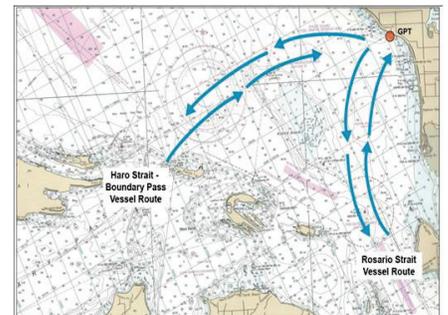
The GPT and Custer Spur proposals are in the heart of an industrial area, with numerous nearby aquatic resources.

forage fish in the region, including Pacific sand lance (PSL) (*Ammodytes hexapterus*), Pacific herring, and their spawned eggs, neuston, eelgrass and cattails. Study PAH concentrations and determine the effect on fish and marine life, including plankton, phytoplankton, zooplankton, which are sensitive to pH and PAH. Study the potential for grease to leak from the rail cars and impact shoreline segments and habitat.

- Vessel operations and the impact on marine life** - Evaluate how emissions from vessels would affect marine habitats, including fuel emissions, escaping coal dust and sewage discharge. Address concerns that vessels idling in Bellingham Bay outside of the terminal would adversely affect the local ecosystem. Evaluate pollution impacts from ships damaged during natural disasters such as earthquakes or tsunamis. Estimate the quantity of coal and diesel particulate matter released from vessels and the location of impacts during normal operation and in the case of disasters or other unforeseen events caused by loss of engine power or crew error. Study the effect of vessel noise and vibration, berthing operations, potential vessel-strikes, wave impacts and prop wash, invasive species in ballast water, risk of oil spills, and anchors dragging on fish and marine life. Evaluate wave and prop scour, sediment, and geomorphic processes. Evaluate impacts on whale feeding patterns and communication, pollution, prey availability, stressors of increased vehicle traffic, and accidents.
- Fish migration and behavior** – Study fisheries in the Puget Sound, and the streams and rivers crossed by the rail line. Evaluate fish migration impacts from changes in lighting, vessel traffic, vessel idling, and noise from vessels and from pile-driving. Evaluate impacts from beach removal and risks from vessel engine propulsion systems. Quantify the percentage of salmon runs affected. Evaluate shade effects on fish and marine life and benthic organisms, including the overwater structures, such as trestles, moorings, and docking ships. Consider the land and water activities at the BP refinery in combination with the proposals' impact on fish and marine life.
- Landslides** – Study impacts from potential increases in mud or landslides on federally protected fish stock, including but not limited to Chinook and chum, in the following fish bearing rivers: Columbia River, Snohomish River, Stillaguamish River, Skagit River, Samish River, and the Nooksack River. Study impacts from potential increases in mud or landslides on forage fish (surf smelt and sand lance) that spawn in the near shore.
- Fisheries industry** – Evaluate the impact that a spill would have on western Alaska fisheries and evaluate ocean acidification on shellfish/seafood and on the seafood industry. Study how exposure to coal dust and all pollutants could affect the taste of marine life in all of Washington state, including salmon, crab, oysters, and



Commenters expressed concerns about how the proposals would affect ongoing environmental recovery projects.



There are existing major shipping routes to the GPT terminal site.



Commenters requested that the EIS evaluate impacts on whale feeding patterns and communication, prey availability, and the stressors of increased vehicle traffic and accidents. (Photo courtesy of NOAA)

halibut. Coordinate with the Pacific Coast Federation of Fishermen's Association and the Taylor Shellfish Farm.

- **Consistency with plans and recovery projects** – Evaluate the proposals' consistency with the Marine Mammal Protection Act, Coastal Zone Management Act, Fish and Wildlife Coordination Act, Magnuson-Stevens Fishery Conservation and Management Act, Oceans Act, Clean Air Act, Endangered Species Act, and NOAA's "killer whale recovery plan" of 2008. Evaluate impacts on recovery projects, including the restoration of Piper's Creek in Seattle, the recovery of the spring run of the Chinook in the Nooksack South Fork and the Lake Terrell Salmon Project. Address concerns that the proposals would cause harm to wildlife habitats, undermining prior investments and efforts to protect and rehabilitate these habitats, which includes hundreds of millions of dollars spent on salmon recovery in Whatcom County, efforts to monitor and protect the Cherry Point herring population from extinction, and instituting local nature preserves and other ecosystems. Coordinate with the Marine Resources Committee (MRC).

Mitigation measures

- Implement no vessel zones in the ocean to protect the orca whale population. Chinese ship captains should be made aware of these conservation efforts. Require all ballast water be pumped ashore to be properly treated by American labor in American facilities, before it is then pumped into the Salish Sea.
- Provide cost analysis and funding sources for impacts and mitigation regarding forage fish loss and food chain disruption. This is particularly important in an ecosystem that supports multiple endangered and federally protected species and shorelines.
- Establish financial responsibility for monitoring salmon and herring habitats for impacts from coal dust and providing mitigation if high levels of toxins are observed. Make sure the proposals are compatible with Salmon Initiative mandates and Tribal policies.
- Provide a clear and easy method for the public to report any observed problems, such as with fish and wildlife habitats. Post signs on the beach with contact information for reporting and requesting information.
- General concerns about effectiveness of fish mitigation measures.

5.8 Noise and vibration

- **Baseline sound measurements** – Evaluate rail in the context of existing, baseline infrasound (noise with frequency content below 20 hertz [Hz]) noise. Study the noise level of the increased rail traffic combined with the increase of noise from the Bellingham Airport expansion. Perform evaluations using as a guideline the



Commenters requested that the EIS study noise and vibration with both full and empty train cars and account for higher noise level from coal trains compared to other trains.

Noise and vibration

Comments were grouped as follows:

- Baseline sound measurements
- Noise from trains
- Compliance with noise regulations
- Vibration impacts on buildings, humans, plants and animals

See also comments in Sections 5.1 Geology and soils, 5.2 Air, 5.5 Wetlands, 5.6 Terrestrial wildlife and vegetation, 5.7 Aquatic resources, 5.9 Hazards and risks, 5.10 Land use, shoreline and recreation, 5.12 Cultural, historical and archaeological resources, 5.15 Social, 5.16 Economics, and 5.19 Human health.

infrasound rules that were recently passed by the Whatcom County council governing wind turbines over 100 kilowatts (kW). As with wind turbine regulations in Whatcom County, a sound criterion of less than 20 Hz should be applied to the trains.

- **Noise from trains** – Study noise and vibration with both full and empty train cars and account for higher noise level from coal trains compared to other trains. Analyze noise for the entire route. Use HUDs 1991 Noise Assessment Guidelines and 2006 FTA Noise and Vibration Impact Assessment for vibration. Identify exceedances of noise criteria at sensitive receptors and whether night work is required. Address concern about the number of trains running through the night. Evaluate how noise would affect residential uses along the rail line within Mount Vernon city limits. Identify changes to established and developing quiet zones. Identify noise-sensitive receivers within 1 mile of the rail corridor, including the number of businesses. Provide details of all noise monitoring locations. Include Custer rail lines in the noise assessment.
- **Compliance with noise regulations** – Identify what federal laws dictate in terms of trains using their whistle/horn as they approach an intersection and whether this can be changed to reduce noise. Address concern about the effect of federally required horns at crossing within the City of Ferndale and its urban growth area (UGA); this federal requirement does not provide for noise mitigation. Consider communities along the rail route that could be at risk for losing HUD funding for projects due to noise from rail traffic.
- **Underwater noise and noise at port** – Address concerns regarding construction noise impacts from drilling piers, underwater noise from vessels including barges, and noise at the port site. Evaluate noise from vessels idling offshore, including duration, frequency, and intensity.
- **Vibration impacts on existing buildings, humans, plants, and animals** – Evaluate the structural integrity and potential impacts on adjacent buildings and homes, including historic structures in Mount Vernon and Seattle's Pioneer Square, as well as others located on unconsolidated fills, such as in the Duwamish Valley and portions of the waterfront in Bellingham. Study the impacts on marine laboratories. Study the effects of vibration on schoolchildren and humans in general. Evaluate the impact of vibration on flora, fauna, birds, marine life, and littoral marine communities.

Mitigation measures

- Provide vibration monitoring and respond to questions about who would pay for damage from vibration.
- Limit track noise and vibration impacts on nearby communities. Implement directional or wayside horns at crossings, quiet zones,

quiet hours, noise walls, and seamless rails within city limits. Include noise abatement measures on train engines, use oilers to reduce rail noise and limit or eliminate switching movements at night.

- Reduce the impact of noise and vibration from shipment on habitat species, including minimizing the exposure of orca whales and other marine species to underwater noise impacts.
- Have BNSF pay for annual inspection of all buildings that have increased risk of premature damage caused by noise and vibration due to heavy rail traffic. Compensate property owners for damages, including buyouts.

5.9 Hazards and risks

- **Spontaneous combustion of coal stockpiles and proximity to BP and Conoco Phillips** – Determine what the likelihood of spontaneous combustion of GPT’s coal stockpiles for the entire range of weather conditions that could occur at Cherry Point, with particular attention to dry summer periods with temperatures in excess of 80 degrees for extended periods and considering climate change projections. Evaluate the likelihood of a fire or explosion to occur at either GPT, BP or Conoco Phillips as a result of locating a 2.75-million-metric-ton coal stockpile barely one mile from BP Refinery.
- **Fumes and water runoff during a fire** – Determine how fires (and related fumes and runoff) would be contained and if there are circumstances under which it would be impossible to rapidly and completely extinguish a fire. Investigate possible impacts resulting from an uncontrolled or uncontrollable coal stockpile fire on the businesses and industries (including fishing, agriculture, and tourism) in the surrounding communities and on the economy of Whatcom County, Washington State, and the Pacific Northwest. Determine what types of toxic substances would be released and what the impact on the health, safety, and welfare of all residents, emergency response personnel, employees, and customers at all businesses and industries in Whatcom County, Washington State, and the Pacific Northwest would be. Study the effects on air, land, and water quality, as well as all natural resources in the surrounding communities, Whatcom County, Washington State, the Pacific Northwest, the Pacific Ocean, and North America.
- **Local emergency services and water utility capacity during a fire emergency** – Determine the effect of a fire/emergency at GPT would have on public services, including the availability of emergency medical services to residents, tourists, business people, and customers in Birch Bay and other communities surrounding GPT that could quickly suffer serious/life threatening health problems from exposure to windblown smoke and toxins from GPT while all emergency personnel and resources are engaged fighting

Hazards and risks

Comments were grouped as follows:

- Spontaneous combustion of coal stockpiles and proximity to BP and Conoco Phillips
- Fumes and water runoff during a fire
- Local emergency services and water utility capacity during a fire emergency
- Effects of combined GPT and BP emissions and fires
- Fires, chemical releases and explosions along the rail corridor
- Spontaneous combustion in ship holds and during transfer from trains to ships
- Geologic, weather and terrorist threats
- Durability of existing structures and aging infrastructure
- Evaluate causes and risks of derailments
- Weather-related closures
- Vessel-related oil spill response and cleanup
- Train-related oil spill response and cleanup
- Clean up costs and responsibilities
- GPT safety and environmental record
- Agency staffing and training

See also comments in Sections 5.1 Geology and soils, 5.2 Air, 5.4 Water resources, 5.6 Terrestrial wildlife and vegetation, 5.7 Aquatic resources, 5.13 Transportation, 5.14 Vessel Traffic, 5.15 Social, 5.16 Economics, and 5.19 Human health.

the fire at the coal stockyard. Determine the water demands that would be placed on other PUD water users for each potential fire safety and weather condition. Determine the adequacy of the PUD water supply and water delivery system, including quantity of water, the specific water delivery systems including water pressure, the number of fire and emergency personnel, and the response time required to rapidly and completely extinguish a fire in GPT's coal stockyard, and study the impact upon Whatcom County resources to acquire and maintain this level of readiness. Determine what the impacts of an uncontrolled or uncontrollable coal stockpile fire would be to the safety of operations at BP Cherry Point Refinery, to the health and safety of BP Refinery's 850 employees, and to BP Refinery's contribution to the economy of Whatcom County, Washington State, the Pacific Northwest, and North America.

- Effects of combined GPT and BP emissions and fires** – Evaluate the likelihood GPT's coal dust emissions combining with BP Refinery emissions and assess how these would impact the likelihood that a fire originating at either GPT or at BP Refinery would then also cause a fire at the other facility. Determine what the impacts of a combined fire at GPT and BP Refinery with its compounded toxicity and hazards would be upon the people, natural resources, and economy of Whatcom County, Washington State, the Pacific Northwest, and North America. Evaluate the impacts of a combined fire at GPT and BP Refinery with its compounded toxicity and hazards upon Whatcom County resources obligated to acquire and maintain sufficient preparedness for rapidly and completely extinguishing a fire at both facilities at the same time.
- Fires, chemical releases, and explosions along the rail corridor** – Determine the risks and consequences of spontaneous combustion on the rail cars, from coal-dust accumulation in brush or forest areas and from train sparks and derailments. Disclose the history of rail fires. Evaluate methods to contain these fires. Determine what effects would occur as a result of burning coal trains on mainline and sidings and the consequences of grass fires near tracks in Spokane County Forest. Study the risks and consequences related to a catastrophic release of chemicals or an explosion in downtown areas along the rail route. Review the laws regarding transport of fossil fuels in the state of Washington.
- Spontaneous combustion in ship holds and during transfer from trains to ships** – Determine the risks and consequences of spontaneous combustion in ship holds and methods of prevention. Assess the risks and consequences of coal dust explosion within the enclosed conveyors built over the water and the enclosed chutes that would transfer coal into the ships' holds.



Commenters were concerned about the risks and consequences of spontaneous combustion in ship holds.

(Photo courtesy of Jay Galvin)



"It is requested the EIS analyses review the environmental and human health and safety effects related to the operation of the Gateway Pacific Terminal facilities during which spontaneous combustion of coal and coal dust explosions may occur."

*– Commenter Alisa Huckaby
(Comment #9688)*

(Photo courtesy of Jeremy Buckingham)

- Geologic, weather, and terrorist threats** – Assess the risks and consequences related to catastrophic events such as terrorist attacks, sabotage, different magnitudes of earthquakes, volcanic eruption, tsunamis, and tornados. Determine the costs of additional security (Homeland Security) and the measures that would be used against terrorist attacks on trains. Evaluate how trains would be protected from protests or sabotage. Evaluate the risks, consequences, and remediation of a shipping accident caused by a tsunami. Discuss whether or not the anchors would be strong enough to hold up to the wind at Cherry Point. Assess, in the worst case scenario, what the magnitude and location of quakes and tsunamis would be. Assess the extent and nature of destruction and damages to the coal vessels and export terminal caused by the worst case quakes and tsunamis and what sufficient capacity would look like. Evaluate how long it would take to restore the health of our marine environment, shoreline ecology, and island economy. Estimate damages in dollars if a worst case event were to happen. Explore provisions that require businesses that benefit from coal export (from mining companies to railways, terminal, and shipping companies) to pay for increased preparedness and set aside sufficient funds for cleanup activities and compensation damages (without residents having to engage in decades-long lawsuits to seek justice and redress). Discuss whether or not ships and the dock would be designed and built to be “earthquake-proven” or “tsunami-proven.” Evaluate terminal designs that can withstand natural disasters, such as earthquakes, tsunamis, and gale-force winds, without leaks or spills from storage sites.
- Durability of existing structures and aging infrastructure**– Evaluate the condition of the rail bridge across Chuckanut Bay, the potential for failure of BNSF Skagit River Bridge, the wooden trestle in Bellingham near the cogeneration plant, the historical Ferndale Railroad Bridge, the downtown Everett train tunnel and other aging infrastructure. Consider updating old infrastructure (bridges more than 100 years old, cracked piers). Evaluate the potential to damage existing rail tracks and the associated costs (repair and safety issues). Consider utility lines near aging bridges and trestles. Assess impacts from heavy train traffic on underground infrastructure. Evaluate maintenance procedures for repairing and grinding the rails and how they could impose a large impact on the surrounding community with excess noise and sparks that could cause accidental fires.
- Evaluate causes and risks of derailments** – Evaluate the risks and consequences of derailments and potential spills, including cost of cleanup and emergency response procedures. Include the communities within the Columbia River Gorge that are not equipped to deal with the public safety and health risks caused by coal train derailment. Study how hot weather, blockages, and coal dust can cause derailments. Disclose frequency of prior coal train



"If the tracks will degrade due to the extra traffic, then the increase in the risk of derailment, which could threaten the health and safety of human communities and ecosystems if a train is carrying coal, needs to be assessed."

– Commenter Ian Alexander
(Comment #3612)
(Photo courtesy of Paul Lavelle)



Commenters asked that the EIS consider the potential for coal dust to block rail drainage and cause safety issues.



Commenters were concerned about the condition of existing rail bridge crossings.
(Photo courtesy of Robert Ashworth)

derailment on other rail lines. Study the possible causes and potential effects of train derailments. Study whether or not coal trains are more likely than other trains to derail. Evaluate the effects of coal dust accumulation in train ballast. Address the potential for coal dust to block rail drainage and cause safety issues. Address likelihood for coal dust to make the train tracks slippery. Because of risk of derailments along the rail line, evaluate use of freight trucks instead of rail to transport coal. Evaluate the potential for derailment of passenger train due to impacts of coal trains on tracks and vibration from coal trains causing landslides.

- **Weather-related closures** – Study the effect of weather and related events on operations and safety, particularly during rainy seasons, when landslides pose a risk to rail traffic and can significantly delay travel if the tracks need to be closed. Address how many days per year the tracks are estimated to be closed due to weather-related events and what alternative haul routes might be.
- **Vessel-related oil spill response and cleanup** – Analyze the risks and consequences of an oil spill and the response times to clean up a spill from a vessel under worst-case weather conditions. Evaluate the combined risks of additional vessel traffic from the Kinder-Morgan pipeline expansion. Consider the effects of a collision and spill with another vessel carrying tar sands or bitumen or other hazardous material. Evaluate the indirect effect of a spill on Washington State Ferries. Evaluate the existing capacity to respond to or clean up spills or related damages; address sufficient response and cleanup capacity. Study distance currents would carry spilled material. Evaluate how long it would take to restore the health of our marine environment, shoreline ecology, and island economy. Estimate financial costs of damages. Address concerns about the effectiveness and side effects of mitigation during spills and normal operations. Study potential for the cleanup of coal in water to damage the seabed. Study the economic and environmental costs of cleaning up and preventing ballast water from entering Puget Sound. Evaluate the spill response capacity in light of U.S. Coast Guard resources being available for spill in Canada.
- **Train-related oil spill response and cleanup** – Address concerns about the impact on the natural environment of a hazardous material spill along the rail line or in water and the associated costs of cleanup and restoration, including legal costs. Discuss who would be financially responsible, including the level of responsibility of local taxpayers. Address ways the companies involved would be responsible for hazardous material spills.
- **Cleanup costs and responsibilities** – Address concerns about how much funding the proponent would set aside for cleanup contingencies. Address whether shippers would be liable for



"How much will more large vessel traffic increase the risk of an oil spill in these waters (and) . . . how adequately can our system of oil spill response and recovery protect our shores and waters when large vessel traffic increases?"

*– Commenter Zena Hartung
(Comment #1873)*

(Photo courtesy of Tom MacKenzie, U.S. Fish and Wildlife Service)



Commenters asked that the EIS study the economic and environmental costs of cleaning up and preventing ballast water from entering Puget Sound.

damage caused by spills and the expense of other marine traffic. Discuss provisions that require the businesses that benefit from coal export (mining companies, railways, terminal, and shipping companies) to pay for increased preparedness and fund cleanup activities and compensation damages (without lawsuits). Assess insurance type and level that GPT would use. Place significant amounts of money in escrow accounts to amply compensate residents for loss due to delay of firefighting equipment and medical emergency vehicles which could result in loss of life, injury, and property losses. Quantify the indemnification that would be required of Ambre (who owns the coal) and the railroad (who is transporting it) to be able to financially handle the cleanup of a derailment in the Columbia River Gorge.

- **GPT safety and environmental record** – Investigate the environmental record of the owners/operators and assess competency; provide details about monitoring of coal stockpile and coal on trains. Study the number and types of safety and environmental citations, warnings, and fines in SSA's history to determine if they pose a threat to regulatory safeguards that protect the environment. Consider worker safety for people operating and around heavy machinery, including the health and safety at the coal mine. The Occupational Safety and Health Administration (OSHA) factors and requirements should be described.
- **Agency staffing and training** – Establish a regional authority funded by the proponents to plan, coordinate, and implement emergency response, accident prevention management, and monitor environmental impacts of ongoing operations. Adequately staff security personnel at sidings and overpasses to accompany every passage. Evaluate public agency personnel and training needs (preparedness and effectiveness of firefighting techniques and methodology), including staffing and adequate response times to address emergencies at the GPT site. Evaluate the capacity for emergency response in Umiak Pass and the Bering Sea. Any volunteers who help with problems incurred should be identified and fairly reimbursed for their aid. Provide equipment and training to local emergency response agencies.

Mitigation measures

- Develop a comprehensive Hazard Response Plan Design of equipment to mitigate explosion risk. Employ best available practices and best available technology for spill prevention, response, and mitigation measures. Create a spill response plan that identifies the local capacity to respond to spills in the Salish Sea and a plan for recovery and restoration after a spill. Specify response measures for any vessel spill/collision/accident associated with GPT. Provide a clear, easy way to report any problems: a sign on the beach with contact information for reporting and requesting



Commenters were concerned about vessel-related impacts.

information. Any incident with a wild animal should be reported to a source available for public viewing.

- Address suggestions to receive funding up front to cover mitigation related to incident prevention and response, including bonds to fund derailment and terrorism insurance or a prepaid deposit of \$50 billion by the proponent to cover damage cleanup, with the interest going towards creating local green energy jobs.
- Establish a notification system should to alert the public of hazardous spills. Establish methods to measure, monitor, and control coal dust, based on real-time monitoring of existing coal train trips.
- BNSF should be required to staff a trailing car, and to fund training and equipment for local first responders, such as the Whatcom County Fire District (#7). Stations should be set up for emergencies and wildlife rehabilitation before a spill occurs. Volunteers that help with spill response and mitigation should be identified and reimbursed for their aid.
- Evaluate use of frequent inspections of the rail bed along the entire corridor to ensure that mitigation measures are effective. Conduct track maintenance outside of fire season. Include derailment risk mitigation: prepare and distribute disaster preparedness materials to the park’s administrators and ensure that public safety meetings are held to release the studied information as well as plans for immediate emergency response. Specify BNSF response requirements for derailment, collision, or spill of any freight train.



Commenters expressed concerns for park use and activities along the rail line. (Photo courtesy of Robert Murphy)

5.10 Land use, shoreline, and recreation

- **Consistency with local, state, and federal plans and policies –** Study consistency of the proposals with various comprehensive plans, implementation plans, and improvement plans. Evaluate the proposals’ consistency with the Whatcom County Code, including the Major Development Criteria and Critical Areas Ordinance; Shoreline Management Act of 1971; Article 12 of the Washington State Constitution; Coastal Zone Management Act; Rivers and Harbors Act; and the City of Bellingham’s Legacies and Strategic Commitments, and other public policies and investments to revitalize older city core retail areas. Address concerns that the GPT proposal is a poor use of prime land that would be more economically viable as another land use. Evaluate effects on U.S. Forest Service-managed lands: Okanogan Wenatchee National Forest, Mount Baker Snoqualmie National Forest, and Columbia River Gorge National Scenic Area.
- **Compatibility with existing planning processes –** Consider the proposals’ compatibility with existing planning processes for new development, including waterfront redevelopment sites at the former Georgia-Pacific facility in Bellingham, along the existing

Land use, shoreline and recreation
Comments were grouped as follows:
<ul style="list-style-type: none"> ■ Consistency with local, state and federal plans and policies ■ Compatibility with existing planning processes ■ Recreational uses ■ Water activities and access ■ Contamination of gardens, agricultural crops and shellfish ■ Rail-related impacts on farm operations and shipping ■ Rail-related impacts to livestock
<p><i>See also comments in Sections 5.3 Energy/greenhouse gases, 5.4 Water resources, 5.7 Aquatic resources, 5.9 Hazards and risks, 5.14 Vessel Traffic, 5.15 Social, 5.16 Economics, and 5.19 Human health.</i></p>

Alaskan Way Viaduct in Seattle and in Stanwood. Loss of future employment and population at these sites could adversely affect local tax revenues and result in jurisdictions failing to meet Growth Management Act housing requirements. Address questions about the viability of developing neighboring Cherry Point Industrial Park and whether the GPT would have land-use impacts on that property.

- Recreational uses** – Evaluate the proposals' impact on parks, including access; ability to plan group activities; partial or full loss of use; health and effect of toxicity, coal dust, diesel, and noise on the parks; and effects of these impacts related to changing weather conditions. Consider park use and activities including sports use, repeated and daily visits, seasonal use, and aesthetic appeal/enjoyment. Evaluate effect on hunting of upland birds (in- and out-of-state hunters).
- Water activities and access** – Evaluate the proposals' impact on the Columbia River Gorge, including access and its status as a National Scenic Area. Evaluate impacts on recreational water activities such as boating, kayaking, and fishing. Evaluate impacts on beaches including increased emissions from vessel traffic, potential coal dust, damage from increased usage or restricted access. Evaluate the impact of large ships occupying surface area; will there be a mechanism in place to charge these vessels a lease fee since they are using public space?
- Contamination of gardens, agricultural crops, and shellfish** – Study effects on home gardens and wildlife, including vegetables, birds, bees, insects, worms, and other wildlife. Evaluate health impacts on domesticated animals and pets. Study contamination of crops and shellfish due to coal dust and diesel soot. Evaluate impacts on the quality and ability to sell the fruit and vegetables that are produced along this line, considering that some fruit cannot be washed vigorously. Include study of raspberries, strawberries, and community pea patches. Study impact on the nutritive value of food crops. Address concerns that organic produce impacts could affect the ability to sell this produce on a global level and could have an effect on the economic value of the "green" brand of northwest agriculture products. Study impact of soil contamination (mercury levels, acidification) on farms. Study potential for loss of white clover from construction; evaluate the potential economic loss to farmers in a 12-mile radius of the GPT, whose clover plantings would be threatened by heavy metal



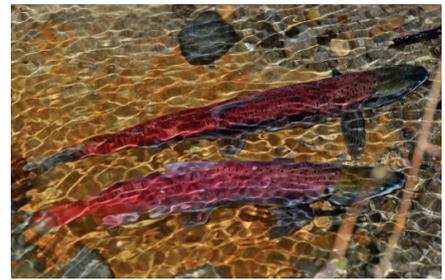
Commenters expressed concern for the social, cultural, and human health impacts on the Lummi Nation. The Lummi Indian Reservation is shown above in proximity to the proposal site.

deposition of coal dust and diesel soot. Evaluate impacts on vineyards and the wine industry.

- **Rail-related impacts on farm operations and shipping** – Address concerns about farm equipment and irrigation systems. Evaluate economic effects of vehicles that have to cross the tracks, in terms of farm wages and fuel. Address impact of reduced rail capacity on transport of fertilizer and grain. Evaluate the threat to agriculture land that bringing more people to the area would cause. Evaluate the loss of fertile soil, effect on aquifers, and the associated effect on the price of food globally. Address concerns about food security. Evaluate the rail capacity constraints and impacts on agricultural shipping practices.
- **Rail-related impacts to livestock** – Evaluate health impacts on livestock, including dairy cattle that graze on grasses. Evaluate effects of coal dust and diesel fumes on the seed bank for grassland and prairie, which would then have an effect on livestock from dietary changes. Consider farm animal crossings of railroad tracks.–

5.11 Tribes, including Indian fishing and fishing treaty rights

- **Cherry Point (Xwe'chi'eXen)**– Study the long-term impact of losing Cherry Point, which is one of the few alternate locations for the Lummi Island ferry to dock on the mainland. Study the cultural impacts on Cherry Point (Xwe'chi'eXen), which is listed on the Washington state heritage register of culturally significant places, is a traditional historical and cultural site to the Lummi, Nooksack, and Samish Tribes, contains sacred ancestral burial grounds, and is a historical reef net fishing site for the Lummis. Consider underwater archeological sites and cultural properties and the erosion effect from waves.
- **Social, cultural, and health impacts** – Analyze the social, cultural and human health impacts on native people, including the psychological effects on Mid-Columbia River Tribes and the Lummi Tribe and on the Nooksack Indian Nation Casino, as well as on Tribal offices, businesses, and residences. Evaluate potential impacts on public health, safety, the environment, and treaty reserve resources on the Yakama Nation. Analyze the effects of train traffic on Tribal lands and its impact on existing businesses and emergency response times.
- **Subsistence hunting and fishing** – Consider impacts on salmon, which is a greater part of Native American diets than it is for non-natives. Evaluate the effects on fish traps, traditional medicine, and other plant gathering, beach seine fishing, and harvesting fishing materials. Study the effect on subsistence hunting of elk and mule deer populations. Consider impacts on



"I am concerned that Gateway Pacific Terminal and the associated shipping traffic will endanger the salmon population of the Puget Sound and beyond."

Commenter Craig Witt
(Comment #598)

Tribes, including Indian fishing and fishing treaty rights

Comments were grouped as follows:

- Cherry Point (Xwe'chi'eXen)
- Social, cultural and health impacts
- Subsistence hunting and fishing

See also comments in Sections 5.3 Energy/greenhouse gases, 5.4 Water resources, 5.7 Aquatic resources, 5.9 Hazards and risks, 5.10 Land use, shoreline and recreation, 5.12 Cultural, historical and archaeological resources, 5.14 Vessel Traffic, 5.15 Social, 5.16 Economics, and 5.19 Human health.

See also Section 6.2 Tribes scoping letters and scoping meeting comments.



Commenters expressed concerns regarding the proposals' potential effects on fishing.

traditional hunting ground, water, and resources on the Northern Cheyenne and Crow reservations.

- **Treaty rights** – Consider the treaty rights for all Tribes along the corridor and review the proposals for consistency. Determine whether the proposals would violate Tribal fishing rights. Compensate the fishing industry and native Tribes for fisheries losses. Consider the legality of moving coal across or using coal from Tribal nations. Evaluate the impacts on water, fish, and terrestrial resources on Tribal lands. Study impacts on Tribal access to housing, fishing, and commerce.

5.12 Cultural, historical, and archaeological resources

- **Noise, vibration, and traffic** – Address concerns related to noise, vibration, and traffic effects on the character of historic resources, as described in greater detail in Section 5.9, Noise and vibration, and Section 5.14, Transportation. Specific areas of concern called out in public comments included the following:
 - Historic districts (including Main Street program) in the study area
 - Historic properties and archeological sites along the entire route
 - Historic Hough Neighborhood in downtown Vancouver, Wash.
 - County and Columbia River Gorge cultural landscapes
 - Historic resources and character of Mount Vernon, Burlington, La Connor
- **Dividing historic downtown areas**– Evaluate impacts the coal trains would have on the West Downtown Historic Transportation Corridor and the East Downtown district, which are two National Historic Register Districts in the city of Spokane. Study impacts of increased train traffic on the economic viability of loft apartments and condominiums located within historic buildings throughout this corridor. Address concerns that train traffic would change the character of historic downtowns, and the corresponding effect on businesses, specifically in Mount Vernon and Bellingham.
- **Removal or destruction of archaeological resources** - Several representative Native American Tribal members expressed concerns over the potential to disturb known, highly sensitive archaeological sites on the GPT proposed site location. Other, non-natives voiced support for protecting these resources and the cultural importance of these resources. Several requested a study of the spiritual and soul impacts on the Lummi people. Others stated that there has been enough damage to these known sites.
- **Traditional Cultural Properties** - During the Seattle scoping meeting, commenters voiced concern over the Tribe’s spiritual

Cultural, historical and archaeological resources

Comments were grouped as follows:

- Noise, vibration and traffic
- Dividing historic downtown areas
- Removal or destruction of archaeological resources
- Traditional Cultural Properties

See also comments in Sections 5.8 Noise and vibration, 5.9 Hazards and risks, 5.11 Tribes, including Indian fishing and fishing treaty rights, and 5.15 Social.

traditions, recent history of Tribe's use of the GPT site for rituals, traditional fishing, and other long-term uses of the site.

5.13 Transportation

- Train traffic estimates and capacity**– Disclose the estimated number of trains, their speed, priorities, and type of engines. Include all trains (trains from the proposals, other freight trains, passenger trains, etc.), vehicle, and trucks cumulatively in analysis and counts used in the EIS. Address concerns about the number of trains (all kinds) that would be using the tracks. Address concerns that if train volume becomes very high, there may not be enough time between trains to clear queuing and congestion that resulted at crossings from the previous train. Study what would happen if the Cherry Point proposals are not built and discuss whether the increase in train and vessel traffic would occur in the near future regardless. Evaluate existing capacity of rail lines. Evaluate impacts on scheduling shipments by rail, which is already challenging with lines currently operating near, at or above capacity. Address concerns about the ability to add additional rail freight and if the proposal would push more freight to trucks or other modes. Address concerns that the proposal requires another track addition at a later date. Study impacts on the ability for growth and on other commodities vying for the same track time.
- Delays at crossings and surrounding intersections** – Address concerns that drivers would spend more time on the road due to waiting for trains to pass at at-grade crossings or attempting to find an alternate route without rail crossings. Evaluate impacts of trains on the level of service for certain intersections and railroad crossings. Discuss the way delays increase as the level of service deteriorates, which may significantly impact some surrounding intersections. Address concerns that the delay for at-grade crossings and nearby intersections may be great and question about how long people would be waiting. Disclose the number of minutes/hours during a 24-hour period in each community that traffic would be interrupted. Address concerns that at-grade crossings would temporarily limit the flow of traffic and cause vehicles to queue in the areas of the crossings; this may spill back to surrounding intersections or farther and cause the delay to spread to other areas. Address questions about how long traffic would take to rebound following a typical train crossing.
- Safety at crossings** – Discuss number of at-grade rail crossings and their effects on collisions. Address concerns that at-grade crossings create conflict points between trains and all other modes, including cars, trucks, pedestrians, bicycles, etc. Analyze each crossing over the course of the rail line and potential mitigation measures at each crossing. Include in analysis the delay, who would be affected (including businesses), public safety, other modes, and pedestrian safety.

Transportation

Comments were grouped as follows:

- Train traffic estimates and capacity
- Delays at crossings and surrounding intersections
- Safety at crossings
- Emergency response times
- Congestion caused by collisions
- Altering automobile routes and loss of local access
- Rail and truck mobility
- Pedestrians and bicyclists
- Passenger rail
- Ferries and cruise terminals
- Buses
- Construction traffic
- Safety threats from windblown coal dust
- Mitigation Measures

See also comments in Sections 5.15 Social, 5.16 Economics, 5.18 Public services and utilities, and 5.19 Human health



Commenters requested that the EIS evaluate concerns that drivers would spend more time on the road due to waiting for trains to pass at at-grade crossings.

(Photo courtesy of Daniel Orth)



Commenters expressed concerns for accidents at at-grade crossings.

- Emergency response times**– Address concerns that emergency response times would increase and questions about how often and to what extent would this occur. Address concerns that increased response times could endanger lives and communities if first responders are unable to quickly access the affected areas, particularly in locations with limited access. Evaluate impacts on medical and insurance costs. Address concerns over road closures or rail crossing issues. Evaluate impacts of road closures and decreased access due to the rail line on first responders and their ability to access the affected areas quickly or at all.
- Congestion caused by a collision** – Evaluate the impact that a collision may have on traffic and what plans would be put in place to address these. Study the impact of a collision with a train on surrounding traffic and blocking of other crossing points if the train is unable to continue moving.
- Altering automobile routes and loss of local access**– Evaluate impacts of closures on residents, workers, and consumers related to reaching their intended destination and the corresponding impacts on businesses and everyday life. Study impacts from rail traffic as it relates to encouraging people to use other routes or choose other destinations altogether. Evaluate impacts that would cause people take other routes, which maybe more circuitous and require longer drive times. Analyze the impacts of drivers’ route alteration on businesses that become harder to get to, particularly if other business options are available. Evaluate impacts of increased rail traffic on access to certain communities, public and private streets, and residential areas that would be affected by rail traffic and crossings, particularly in locations where access is already limited. Study how backed-up traffic due to crossings might block access to streets and businesses.
- Rail and truck mobility** – Respond to questions about freight mobility, including both rail and truck freight. Address how other rail line users would have to compete for use of the tracks, potentially affecting industries and businesses in the area. Evaluate impacts of crossing and increased train volume on trucks, including delays or access limitations, which may delay shipments and also affect industries and businesses in the area. Evaluate impacts on growth that could occur for freight transportation.
- Pedestrians and bicyclists** – Address concerns about conflicts between rail and pedestrians and bicyclists. Evaluate impacts related to at-grade crossings creating conflict points between modes that can put pedestrians and bicyclists at greater risk. Address concerns including students walking to and from school, ADA accommodations and compliance at crossings, and nonmotorized facilities.
- Passenger rail** – Evaluate negative impacts on commuters and other passenger rail. Study impacts increased freight rail volumes



"How will the rail traffic from the proposed facility affect emergency response times and the regional quality of life due to traffic back-ups at rail crossings from the coal mine to the terminal?"

*– Commenter Moigone Azemun
(Comment #11913)*



*Commenters were concerned about who would be responsible for transportation mitigation, such as providing alternative access when certain routes are blocked.
(Photo courtesy of Grey Goebel)*

would have on passenger rail, in terms of delay, interruptions in service, and/or reductions in service. Evaluate negative impacts of additional coal trains on safety of passenger rail.

- **Ferries and cruise terminals** – List and evaluate impacts on ferry traffic and cruise traffic. Address concerns that increases in rail and waterway activity would cause congestion and delays at ferry terminals on the land and water sides, including the Edmonds and San Juan ferries. Evaluate impacts caused by docked ships and passing coal trains on cruise terminals, including impacts related to delays and congestion.
- **Buses** – Evaluate the impact on buses, including school buses and the King County Metro bus system. Address bus delays caused by rail crossings and related congestion, creating unreliable service, affecting the school day, causing more fuel to be burned and increasing costs.
- **Construction traffic** – Analyze and discuss the impact of construction traffic as well as the manner and type of transportation to be used by the construction workforce.
- **Safety threats from windblown coal dust** – What are the safety threats to highway travelers from windblown coal debris from trains? Would coal dust on pavement in rain, snow, and ice, create a slick surface that would increase highway accidents? Address concerns regarding the impact that coal debris or dust would have on safety. The dust may blind drivers if it is blown onto nearby roads or debris may create safety issues if drivers try to avoid it or hit it. In addition, there are questions about whether or not coal dust on pavement or on train tracks may create a slick surface, particularly in rain, snow, and ice and cause collisions or issues in braking.

Mitigation measures

- Address concerns about whether mitigation for offsite impacts from additional rail traffic is within the scope of this proposal, which should be addressed as part of the Gateway Pacific EIS, including impacts along the entire rail line.
- Address concerns about who is responsible for transportation mitigation, such as providing alternative access when certain routes are blocked. This includes associated infrastructure upgrades, such as grade separations, that could put an unfair burden on taxpayers. Federal law prohibits railroads from paying more than 10 percent of the cost for safety improvements such as at-grade crossings. Evaluate whether funds from the American Recovery and Reinvestment Act could be used to build overpasses and bridges.
- Increase passenger train service as mitigation for increased freight train traffic. This could involve building new parallel tracks or



Commenters were concerned that increases in waterway activity would cause congestion and delays at ferry terminals on the land and water sides. (Photo courtesy of John Bromley)



Commenters asked that each crossing along the rail line be evaluated and potential mitigation measures identified. (Photo courtesy of Kurt Haubrich)

sidings or re-using old railways that had been paved over in some areas.

- Prioritize and schedule rail traffic to minimize congestion. Mitigation for the cost of delays at rail crossings for businesses along the entire rail corridor, including employees experiencing delays getting work and delays in goods shipments.
- Include grade-separated crossings; provide emergency access roads; limit the number of trains per day and cars per train; increase train speeds to make wait times shorter; publicize railroad schedules; limit how long trains can block crossing; use double arms on at grade crossings use incident management tools such as intelligent transportation system (ITS) signage for the public and emergency service providers to provide alerts on road closures; and create a communication system for emergency service providers to notify BNSF when trains need to provide access.
- Prioritize crossings near large schools and hospitals.
- Proponent should pay for bridges and to replace grade crossings.
- Develop a Road Use Management Plan in the EIS to address mitigation measures during the construction phase of the proposals, including temporary access to adjoining properties, temporary haul roads, and monitoring of materials transportation on the road network.
- Employ traffic safety and incident management techniques, including notification systems to advise road users of planned traffic restrictions and roadside cleanup measures for accidents.
- Involve citizens in infrastructure upgrade planning if taxpayers will be paying for upgrades. Require Bridging the Valley (Spokane) project to be completed. Include double-tracking of entire rail route, identify proposed train layover locations in event of track closures.

5.14 Vessel traffic

- **Navigational hazards** – Study the ability of Panamax and Capesize vessels to navigate safely through Rosario and Haro straits, NOAA-designated *precautionary areas*, under foul weather conditions and their ability to slow down, change direction, or stop in a timely way. Address concerns regarding partially exposed ship propellers and reduced ability to navigate. Address concerns about vessels drifting sideways in big winds. In the absence of ballast, please study the effects of windage on steerage and safety during tight navigation in the Salish Sea. Assess mitigation of navigation issues in bad weather when more hull is exposed. Evaluate Turn Point at the north end of Stuart Island, where the shipping lanes make an almost 90-degree turn and the passage is narrow. Address concern about space allowed for docking cape-size vessels at GPT

Vessel traffic

Comments were grouped as follows:

- Navigational hazards
- Tugboats and pilot boats
- Fishing fleet, recreation, bridge openings
- International safety standards
- Vessel queuing and delays
- Vessel collision study
- Mitigation Measures

See also comments in Sections 5.2 Air, 5.4 Water resources, 5.7 Aquatic resources, 5.8 Noise and vibration, 5.9 Hazards and risks, 5.10 Land use, shoreline and recreation, 5.11 Tribes, including Indian fishing and fishing treaty rights, 5.13 Transportation, 5.16 Economics, 5.19 Human health, and 5.20 Cumulative effects.

and potential collision with the adjacent BP terminal. Conduct a tidal current study and other protocols to reduce the risk of vessel collisions, groundings, spills, and other operational incidents, as well as to facilitate the wharf design and final orientation.

- **Tugboats and pilot boats** – Define the use of tugboats and pilot boats in terminal and shipping operations to prevent impacts from excessive vessel traffic, including identifying the home base of these boats, the location where they meet with ingoing or outgoing vessels and the amount of discretion pilot boats have over vessel movement decisions. Investigate whether the tugboats would be capable of firefighting at sea, where they would be fueled and any diesel emission impacts.
- **Fishing fleet, recreation, bridge opening, and tugboats** – Evaluate impacts of increased vessel traffic on fishing, including safety issues for fishermen. Evaluate the possibility of fishing nets and crab pots coming into conflict with cargo vessels. Address concerns for the safety of kayaks (wakes can harm kayakers) and very small boats around very large ships and safety of swimmers during the day and night. Address concerns regarding the amount of vessel traffic and what effects that may have, including damage to fishing equipment or recreational vessels, increased bridge openings and delays, insufficient room for waiting vessels, impacts on tourism, and the availability of tugboats with the appropriate equipment.
- **International safety standards** – Address concerns that tankers registered in certain places might have higher standards than tankers registered elsewhere, such as Panama; discuss restrictions on these tankers. Study vessel navigation and safety, proportion of vessels under various flags and the associated safety requirements for each flag/country. Address concerns about the pilot boat and safety requirements for vessels. Discuss the safety training of foreign coal ship crews and who would provide the training. Discuss which agency would monitor the ongoing training. Address concerns about the crews' English proficiency and whether Americans would be part of the crew. Address concerns about the location of safety inspectors (would they be stationed at the Cherry Point terminal?). Address concerns about consistency with the International Maritime Solid Bulk Cargoes (IMSBC) code. Assess the effects of additional vessel traffic on the efforts and demands of the Cooperative Vessel Traffic Service.
- **Vessel queuing and delays** – Evaluate impacts of vessel queuing on waterway congestion, particularly at narrow segments. Evaluate impacts of vessel queuing on other businesses that rely on the waterways. Study the increase in noise and costs. Evaluate impact of waterway congestion on recreational uses of the area. Estimate the number of days per year that traffic in the affected waterways is likely to be slowed or that waterways would be impassable due to



Commenters asked that a vessel traffic study be conducted that includes all types the number of pilot and tug boats required for the proposal.

(Photo courtesy of Ingrid Taylor)

weather conditions or other reasons. Assess proposed vessel traffic levels in the waters. Evaluate how shallow or narrow waterways, strong currents, fog, and wind would affect the proposed/available shipping lanes.

- **Vessel collision study** – Analyze all potential vessel accidents, including groundings, loss of propulsion, loss of steering, navigational errors, and fuel oil spills. Assess the risks and consequences related to a collision with a British Columbia ferry, a dock, another vessel carrying tar sands, bitumen or other hazardous material, coal ships, tankers, container ships, commercial boats, cruise ships, smaller vessels, and recreational vessels. Evaluate the risks and consequences of oil or coal spills. Analyze risks of vessel collision with other fixed objects (other than docks). Address concerns over increased vessel collisions and long-term impacts, specifically collisions with vessels carrying tar sands, bitumen, or other hazardous materials that could spill. Address concerns about long-term effects of collisions, the cost of clean-up, and human-health impacts. Evaluate potential for the following collisions types: coal ship to coal ship; coal ship to ferry; coal ship to oil or container ship/tankers; coal ship to small commercial boat; coal ship to cruise ship; and coal ship to recreational boat. Evaluate potential for allisions or collisions and other accidents due to avoidance maneuvers from non-proposal vessels. Review the 2008 BP Refinery Vessel Traffic Risk Assessment study, which projected dramatic increases for both the risk of marine vessel accidents and oil spills or outflows resulting from collisions between two vessels, groundings (both powered and drift), and collisions (collisions with the dock or other fixed objects) if crude vessel traffic levels increased by 17 percent at the BP Cherry Point Refinery. Study rate of accidents from ships designed, built, and operated by third-world nations compared to run-away flag operators and compared to American-, Japanese- and northern European-run ships.
- **Prevention and response**– Study accident response in Unimak Pass, which is a dangerous pinch point. Address the need for full compliance with all requirements of the 1999 Settlement Agreement, specifically, Tidal Current Study (2.10 e); Vessel Traffic Analysis (2.10 a); Vessel Mooring Study and Plan (2.11); and Spill Prevention, Preparedness and Response Plans (2.9 a). Evaluate long-term impacts, cost of cleanup, tidal flow scenarios, and human health impacts of coal-vessel accidents. Evaluate the impact of the sinking of a coal-filled ship. Evaluate impacts on health and safety of employees at GPT and the BP refinery. Complete a vessel traffic (hazard) study that includes contingencies for various situations (including weather and emergencies) and a review of the ability to meet standards and regulations.

Mitigation measures

- Optimize terminal layout and operations to reduce impacts from ship transport. The terminal dock should be constructed to face towards the ocean instead of parallel with the coastline to limit wave disruption. The terminal should accommodate on-wharf positioning of spill-response barges, boats, and other equipment.
- The terminal should keep stringent local piloting requirements and restrict the use of ships that do not have high safety records or the capability to use shorepower.

5.15 Social

- **Impacts on low-income and minority populations** – The EIS should address environmental justice issues where impacts affect predominantly minority or low-income populations including more deaths, health impacts, and noise on poor populations. The effect of school bus delays on low income students (delay of students on free/low cost breakfast/meal program); the environmental justice effect of using the Nooksack River as a water source, the global environmental justice issues especially for indigenous peoples; environmental justice issues for retired people and indigenous people near the train tracks that will be affected by coal dust; environmental justice of air quality effects: exposure, health, noise, and other impacts in major urban centers of southern and western Washington, physical, natural, social, and cultural effects, ethnic communities. Address concerns that those who can afford to leave and move elsewhere from Bellingham will, which would result in environmental justice issues.
- **Community events and culture** – Evaluate impacts of increased train traffic on certain areas, projects and events: areas include the downtown Seattle waterfront, SODO industrial area, I-5 corridor in Skagit County, northwest Washington, and the entire Washington transportation network in general; projects include the proposed SODO arena, the redevelopment of the Georgia Pacific site, Mukilteo waterfront redevelopment, and future high-speed rail development; events include special events like the Sea to Ski and summer concerts. Study impacts related to trains dividing cities including Mount Vernon. Evaluate impacts on the community resources, including the following:
 - Amadeus Project, a music school in downtown Bellingham on Cornwall Avenue
 - Cultural heritage of Oregon Trail and Lewis and Clark
 - Cliffside Community (Bellingham)
 - Deming Library
- **Community cohesion and character**– Address concerns about the stigma on affected communities, including small rural towns along SR 9. Evaluate impacts on communities along the rail line, including several downtown business districts that the rail line bisects, such

Social
<p>Comments were grouped as follows:</p> <ul style="list-style-type: none"> ■ Impacts on low-income and minority populations ■ Community events and culture ■ Community cohesion and character ■ Degradation due to noise and pollution ■ Degradation to academic science and ecology programs ■ Community consultation management plan ■ Mitigation measures <p><i>See also comments in Sections 5.3 Energy/greenhouse gases, 5.9 Hazards and risks, 5.10 Land use, shoreline and recreation, 5.11 Tribes, including Indian fishing and fishing treaty rights, 5.13 Transportation, 5.14 Vessel Traffic, 5.15 Social, 5.16 Economics, 5.17 Visual resources, 5.18 Public services and utilities, and 5.19 Human health.</i></p>



Commenters asked that the EIS study the effects of noise and pollution on local residents’ health and wellbeing, as well as associated costs.

(Photo courtesy of Christine Kossol)

as in Edmonds, Stanwood, and Bellingham, where shoppers may choose to shop elsewhere due to train delays. Evaluate impacts on walkability in the towns along the rail route and public land access along the entire rail route. Evaluate the loss of regional identity and rural character because communities and neighborhoods could be divided. Study the impact of coal dust on nearby communities from routine operation, including the cost and responsibility for mitigating increased arsenic in soils. Identify possible property acquisitions as a result of the proposal or related improvements. Address concerns about property acquisition impacts from the proposals. Contact residents and business along the route for first-hand accounts of rockslides and how it has affected their lives and livelihoods. Residents should be relocated to communities with the same views and amenities as existing, such as the semiprivate beach of the Cliffside Community Association. Evaluate the impact of vessel wake on private docks or inundated archaeological and marine shipwrecks.

- **Degradation due to noise and pollution** – Study noise and pollution impacts on nearby communities along the rail line and around the GPT site. Evaluate impacts related to air (coal dust) and noise pollution on retired people and indigenous people near the train tracks. Evaluate potential effects of noise and pollution on local residents' health and wellbeing, as well as associated costs. Assess noise impacts on the housing market and the area's attractiveness to workers. Address concerns that noise impacts might serve as a basis for employers to relocate or decide against locating along the rail line. Address concerns that idling trains on a proposed new active siding rail track in Bellingham could harm the economic vitality of the area due to noise, pollution, and right-of-way impacts.
- **Degradation to academic science and ecology programs** – Consider the effect on the environmental science and ecology programs at Western Washington University. Address concerns the proposals might affect the ability of the university to attract research faculty, and students, which would have a multiplier effect on the local economy. Address concerns that the proposals might compromise marine research labs operated by Western Washington University and the University of Washington at Shannon Point and Friday Harbor, respectively—pollution caused by the proposals or material spills may require the closure of these facilities, which would result in great financial and social costs.
- **Community consultation management plan** – Include a Community Consultation Management Plan to keep communities informed and involved. Address concerns that properties near tracks would be abandoned, leading to unmaintained lots and the accumulation of trash. Address concerns that people who can afford to leave Bellingham would move and, in the future, people would not want to move to Bellingham to retire or raise a family.



Commenters were concerned about the regional identity and rural character of communities—Skagit County Tulip festival is shown here.

(Photo courtesy of Missy Leone)

Address concerns about farming and fishing communities being protected from coal extraction and shipment.

Mitigation measures

- Plant a tree buffer along the rail route.
- Wash nearby homes that become covered in coal dust.
- Created a sinking fund to compensate residents, businesses, local governments, and nongovernment organizations to cover property takings in the present and future.
- Compensate farmers and ranchers near the mine site for losses to fertile farmland.
- Build bypass tracks to mitigate risk to farmland (specifically in Bow).
- Include a funding source for mitigation and other expenses, such as direct cash payments from the proponent, using a portion of tax revenue generated by the proposals (revenue sharing), or increased fees on mining, and/or use of port facilities.

5.16 Economics

- **Economic losses to existing businesses** – Document the costs to businesses, developers, and large property owners, including costs related to expended gasoline, shipment delays, missed ferries, hourly wages, and idle fleet vehicles. Address concerns that businesses within 1,000 feet of the rail line are likely to see the greatest impacts. Address concerns that many companies may choose to relocate or not locate their office near the proposal due to health or safety risks. Use multiplier effects to estimate the number of job losses forecasted in other industries from the construction of the proposal. Include jurisdiction-specific multipliers to capture impacts accurately.
- **Economic losses caused by congestion** – Disclose number of both small and large businesses whose services or production will be affected by the traffic interruptions, including production materials, parts, goods for sale, employee, and customer access. Particular attention should be given to contemporary just-in-time manufacturing and to retailing. Evaluate the impacts of congestion and delays at at-grade crossings on businesses, such as the delay of shipments and the ability of trucks to deliver goods, along the entire corridor. Evaluate impacts of congestion and delays on existing port and marina industries. Examine the expected impacts at the Kincaid Street, Blackburn Road, and College Way crossings in Mount Vernon. Address concerns that construction of the proposals, including construction of grade-separated rail crossings and other related infrastructure, could negatively impact businesses.

Economics

Comments were grouped as follows:

- Economic losses to existing businesses
- Economic losses caused by congestion
- Economic losses for tourism
- Economic losses for ecotourism, fishing and farming industries
- Job loss and freight delays due to landslides
- Economic losses on other industries
- Economic benefits from job creation
- Job opportunities
- Evaluate job opportunities based on other uses of the proposal site
- Job losses
- Coal market assumptions
- Consistency with BNSF rules and provisions
- Employment cost-benefits
- Social cost-benefits
- Property cost-benefits
- Infrastructure and support service cost-benefits
- Source of funds
- Direct and indirect costs
- Premature closure of port
- Other environmental and health costs
- Mitigation measures

See also comments in Sections 5.1 Geology and soils, 5.2 Air, 5.3 Energy/greenhouse gases, 5.7 Aquatic resources, 5.9 Hazards and risks, 5.13 Transportation, 5.14 Vessel Traffic, 5.15 Social, 5.18 Public services and utilities, and 5.19 Human health

- **Economic losses for tourism** – Evaluate the effect of GPT on tourism and entertainment industries and associated loss of jobs and revenue in those industries and to the community. Evaluate impacts on the recreational industry (rafting, fishing, and camping) that relies on the rivers that flow alongside the coal rail corridor. Specifically, study the following locations and events for possible adverse effects:
 - Bellingham
 - Whatcom County
 - San Juan County
 - Ski to Sea Race
 - Mount Baker Highway corridor
 - Edmonds
 - Seattle
 - Mount Vernon
 - Skagit Valley Tulip Festival
 - Stadium events in SODO
- **Economic losses for ecotourism, fishing, and farming industries**– Evaluate the impact of GPT on other industries, directly relating to environmental quality; these industries include ecotourism and agriculture. Evaluate impact of increased train traffic on the supply of diesel fuel for rural and farming enterprises, including Deming. Address concerns about loss of ranch land from coal mining in Montana and Wyoming. Evaluate the impacts of a hazardous material spill on the local art industry due to negative effects of a spill on local artists' inspiration and a decline in purchased artwork. Study the impact that the proposals would have on the reputation of Whatcom County food and farming products, including fish and shellfish, and how that would affect the produce/fish market under accident and normal conditions. Evaluate marine impacts on the loss of jobs in the fishing, seafood, tourism, and recreation industries, including impacts stemming from a cargo spill along the rail line or in water. Evaluate effects of large shipping vessels damaging fishing equipment such as crab pots and nets.
- **Job loss and freight delays due to landslides** – Address concerns about costs associated with loss of business and jobs due to landslides caused by train vibrations along the rail route. Evaluate impacts of delayed freight shipments caused by landslides.
- **Economic losses on other industries** – Address concerns about the loss of traffic to existing shippers and the corresponding loss of revenue and jobs, including effects on marina and port industries and truck, rail, and boat shipments. Evaluate adverse economic impacts on Blaine Harbor. Evaluate impact on oil refineries at March's Point and Cherry Point. Address concern that increased train traffic would impede rail service to the refineries, which might cause refineries to cut back on shipping, which could in turn cause fuel prices to increase to the detriment of the local economy.



*Commenters asked that the EIS study the impact that the proposals would have on the reputation of Whatcom County food and farming products.
(Photo courtesy of Steve Cyr)*

Quantify opportunity costs from businesses choosing not to locate here.

- **Economic benefits from job creation**– Conduct an economic impact analysis to measure changes in economic growth, including benefits and costs of the proposals, and associated changes in jobs, income, and total revenue. The analysis should include distribution of economic effects from the proposals. Specific information should include the number of total jobs that would be created by the proposals and the ability of local workers to apply for construction jobs and jobs at the GPT port facility. Address concerns that the proposals would bring too much economic growth to the area, and that the unintended consequences of more jobs as a result of the proposals, such as more traffic congestion, may not be desirable. Evaluate impact of short-term construction jobs on the local economy.
- **Job opportunities** – Provide information about the types of jobs that would be created by the proposals, including the number of unionized jobs, the expected number of short-term construction jobs compared to long-term railroad and port jobs and the types of indirect job effects the proposals would have. Address concerns that the location of Cherry Point in relation to certain jurisdictions, such as San Juan Islands, makes it difficult for those residents to take advantage of the new jobs. Address concerns that the proposals may not create family-wage jobs. Analyze the possibility that the port would have a legal commitment to provide a certain number of jobs at certain salaries, which should be disclosed. Address concerns that the proposals may overestimate the number of permanent jobs created. Discuss how advances in earthmoving and manufacturing technology may depress the number of total jobs created due to increasing reliance on automated processes.
- **Evaluate job opportunities based on other uses of the proposal site** – Conduct an economic analysis to determine the number of jobs that could be created from an alternative use of the port site as a basis of comparison; examples include alternative energy development and creating a multiple-use coal terminal instead of single-use.
- **Job losses** – Address concerns that exporting a low-value commodity such as coal to China would increase that country's industrial competitiveness with American industries and take away family-wage American jobs due to new factory construction. Address concerns that the proposals would promote the growth of multinational corporations, reduce capacity to export more valuable commodities and require foreign oil to power coal trains. Address concerns that the proposals would have a negative impact on the U.S. trade deficit and Gross National Product.
- **Coal market assumptions** – Address concerns that the proposals are predicated on the assumption that long-term coal trade is

profitable. Disclose the length of the coal export contract and possibility for renewal. Address concerns that coal from the Powder River basin would have to compete against sources of coal that are closer to China and which have cheaper labor costs, such as Indonesia and Australia. Conduct a global coal market study and benefit-cost analysis comparing the proposed GPT proposal and alternative energy development. Respond to concerns related to the possibility of coal shipments being refused along the rail corridor.

- **Consistency with BNSF rules and provisions** – Evaluate the proposals' consistency with Item 100, Coal Dust Mitigation Requirements, BNSF tariff # 6041-B, issued July 14, 2011, Providing Rules and Regulations Governing Unit Train and Volume All-Rail Coal Service, Also Accessorial Services and Charges Therefore Applying as Provided in Price List. Consider the legal action before the U.S. Surface Transportation Board, Western Coal Traffic League, American Public Power Association, Edison Electric Institute and National Electric Cooperative Association, Finance Docket 35557, challenging BNSF's tariff.
- **Employment cost-benefit** – Address concerns that the cost of the proposals is too high for the expected benefits. Evaluate the number of expected new, net permanent jobs from the terminal and whether this number would be sufficient to justify the cost of the proposals due to the level of investment needed. Address job losses from other industries, such as fishing and tourism, that may counteract new port jobs. Include a comprehensive benefit-cost analysis for all direct, indirect, and cumulative costs. Include the cost of unemployment insurance for displaced fishermen, whale watch businesses, ecotourism, restaurants, and lodging that are dependent on the existing natural environment, include the costs of extended wages for preparation of EIS; include any public costs including legal costs for establishing mitigation. Compare with expected profit, and changes in private employment/wages/income and public revenues. Compare to economic effects of spending public money to invest in renewable energy. Use environmental full cost accounting to measure environmental, social, and economic costs and benefits. Include a risk-benefit analysis.
- **Social cost-benefit** – Use environmental full cost accounting to measure environmental, social, and economic costs and benefits. Provide an economic analysis that includes impacts on parks and recreation facilities and measures the loss or degradation of these resources and associated social and economic costs, as well as costs associated with impacts on emergency services and local school districts. The economic evaluation should be done along the entire rail line and include cumulative costs, as well as the cost for each park individually.

- Property values** – Evaluate the impact of the proposals on property values along the rail line, which would affect the valuation of homes and businesses as well as revenue that local jurisdictions receive from property taxes, such as funding for public schools. Address concerns that this loss of value and revenue may cause jurisdictions to raise taxes elsewhere to make up the deficit. Address concerns that a hazardous material spill may have an even more pronounced effect on property values. Address concern that there would be no reimbursement for loss of property values. Study the number of homes within 600 feet of the rail line for effects on the property values as a result of the noise, traffic blockage, air quality, vibrations, and damage to the neighborhoods' reputations for safety, quiet, and family friendly character.
- Infrastructure and support services cost-benefits** – Address concerns about the cost of required infrastructure improvements along the rail line and at the port and the amount that taxpayers would be responsible for paying, including costs of grade separation, sound walls, and various traffic safety improvements, which are critical for public sector jobs such as emergency services, sanitation services, and paratransit. Address concerns about taxpayers being subject to the economic cost of paying for these mitigations or the social cost of more congestion and noise. Assess the impact of road maintenance budgets on municipalities along the rail line that would need to pay for the bulk of repair and maintenance of rail crossings. Provide an estimate of the impact of these expenses on the discretionary budgets in relation to health and welfare expenses for jurisdictions.
- Source of funds** – Disclose proposal funding sources for proposal elements including the environmental planning process, proposal construction, operation, maintenance, and crossing improvements. Disclose the financial solvency of the owners and investors of the proposals.
- Direct and indirect costs** – Analyze short- and long-term costs that taxpayers would bear both directly and indirectly related to the proposals: direct costs include grade separating rail crossings to reduce travel time delay; and indirect costs include subsidies related to coal extraction, such as the leasing of public lands in Montana and Wyoming and subsidies related to freight railroad federal tax credits.
- Premature closure of port**– Evaluate the economic feasibility of converting port structures to eventual adaptive re-use or salvage. Consider the magnitude of costs and mitigation of the proposals if it has a shorter lifespan than predicted due to market factors, new technology or other factors. Calculate other costs due to premature closure, such as environmental cleanup.
- Mitigation costs** – Identify mitigation projects in the EIS, including the cost of proposal mitigation and financial liability for impacts



"What will be the loss to each community's economy in terms of lost property value and lost productivity due to the increase in train traffic?"

– Commenters Robyn du Pre and Daniel Remsen

(Comment #13498)

during extraction and shipment. Delineate the impacts of all proposed mitigation measures, as well as costs for ongoing mitigation efforts, monitoring for effectiveness and possible remediation. Set a limit for proposal environmental impact limits, with mandatory remediation beyond this limit. Off-site mitigation should comply with the Whatcom County Code. Address the possibility that irreversible environmental impacts may make any mitigation inadequate.

- **Other environmental and health costs** – Address concerns about the environmental impacts and financial responsibility stemming from routine operation of the facility and rail line, including cleaning coal dust on tracks and in surrounding properties and habitats. Address concerns that the proposal would provide short-term economic gain in contrast to long-term external costs, including the effects of climate change, hazardous material spills, increased pollution, and other health and environmental impacts. Address the concern that, instead of the companies involved, taxpayers would pay for the costs of these long-term indirect impacts. Address concerns about the costs resulting from proposals' impacts such as coal dust and blocked crossings, including public health expenses (including autism and stress/depression), and public services and utilities costs. These expenses should be paid by the proposals' proponents instead of taxpayers and compensation should include life, injury, and property losses due to delay of fire and emergency services.

Mitigation measures

- An ombudsman could help facilitate communication and compensation by the proposals' proponents for local property owners and jurisdictions.
- Job training and placement programs should be provided for those in the local workforce who are only promised temporary employment.

5.17 Visual resources

- **Community character** – Address concerns related to preserving the aesthetic character of towns along the train route. Study how changes in aesthetics may also affect local tourism economies, including in the following jurisdiction:
 - Mount Vernon
 - La Connor
 - Burlington
 - Conway
 - Anacortes
 - Edmonds
- **Scenic character and viewsheds** – Consider how to preserve the scenic character of parks and natural resource lands, including

Visual resources

Comments were grouped as follows:

- Community character
- Scenic character and viewsheds
- Light pollution

See also comments in Section 5.15 Social.

Puget Sound and the Columbia River Gorge National Scenic Area. Evaluate impacts on scenic views and view corridors throughout the state and the Pacific Northwest including Chuckanut drive. Study impacts on views of the ocean, such as from Amtrak trains, that would be marred by large ships, loss of wildlife characteristics, and other blight. Study the proposals' visual impacts under both normal operational conditions and catastrophic conditions. Also consider the views of the proposal sites from residential areas and provide mitigation for screening those views.

- **Concerns related to light pollution** – Assess the effect of light pollution from the GPT site as a result of the hundreds of yard lights planned around the coal stock piles at the terminal. Minimize light pollution at the facility. Evaluate changes in light quality due to pollutants. Assess effects on air quality, visibility, and regional haze in Olympic National Park and North Cascades National Park.

Mitigation measures

- All lights should point down to reduce glare, and there should be a system for safely lifting and lowering light fittings at flood light towers around the perimeter of stockpiles during high winds.
- Include two settings for stockpile lighting control: one to achieve minimum safe access lighting levels during non-reclaim operation periods and another at 100 percent during reclaim operations.

5.18 Public services and utilities

- **Demand and capacity of services and utilities** – Evaluate the proposals' impacts on essential facilities, including rail line. Evaluate the increased agency staffing demands due to the substantial effort required for review of the GPT EIS, and the effect on staffing required to review other concurrent proposals. Evaluate the increase in public service needs as a result of increased population and employment and the effect on the quality of life. Study impacts on school districts related to families moving for construction and other temporary jobs. Address concerns that crime rates and criminal justice costs may increase.
- **Delays due to blocked crossings** – Evaluate vehicle delays at crossings along the rail line and how they might negatively affect emergency services, transit services, sanitation services, school buses, and other vital traffic. Study how train traffic would bisect communities, separating residents, and business from emergency services, and hospitals. Identify towns and cities along the entire rail corridor with hospitals located across the rail lines from a major portion of the population. Quantify the number of annual emergency vehicle response cases that would have longer response times as a result of increased train traffic. Evaluate the overall effect on level of service to hospitals, including Skagit Valley Hospital in Mount Vernon, United General Hospital in



Commenters expressed concern for the scenic character of parks and natural resource lands.

Public services and utilities

Comments were grouped as follows:

- Demand and capacity of services and utilities
- Delays due to blocked crossings
- Emergency response times

See also comments in Sections 5.9 Hazards and risks, 5.11 Tribes, including Indian fishing and fishing treaty rights, 5.13 Transportation, 5.14 Vessel Traffic, 5.15 Social, 5.16 Economics, and 5.19 Human health.

Sedro-Woolley and to and from multiple clinic sites in Skagit and Snohomish counties. Describe the emergency response plan for dealing with train back-ups in case of an accident or emergency situation. Assess the impact on public safety as a result of delaying the transportation of dangerous prisoners and convicts between jail houses and court houses in all communities where at-grade train tracks separate the two locations.

- **Emergency response times** – Evaluate the impacts on emergency response times for ferries, Coast Guard, police, fire, EMS, and spill response workers when access is blocked while a train is stopped and alternate routes would be longer distances and take more time. Evaluate how train traffic would affect volunteer firefighters in Conway who live on the wrong side of the track, or emergency response times for an area in Mount Vernon because there is only one way in and out, or emergency response efforts and evacuations for flooding along Skagit River. Consider how mutual aid agreements would be affected. Evaluate the increased costs of extraneous medical conditions as a result of EMS delays and increased fire insurance premiums to due delays in fire response.

5.19 Human health

- **Vulnerable populations** – Populations identified as being most vulnerable to health effects included the Lummi people and other Tribes along the rail route; children, and elderly; children on playfields/sports centers near tracks; children with mental health issues and learning disabilities; students and staff in the Ferndale school district; low-income and minority populations; patients in hospitals along the route; people with already-compromised immune systems, such as those with multiple sclerosis; people who live or work near the tracks, including employees at the terminal and those working on ocean ships transporting the coal; and veterans. Pets and children who recreate in and near the water were also identified as populations vulnerable to health effects from water pollution.
- **Coal and exhaust constituent concentration, characteristics, and effects** – Identify the constituents in coal and diesel exhaust that are potentially toxic to humans, animals (birds, mammal, fish, shellfish, amphibians), and plants and the incremental increase in risk for cancer, asthma, and other health risks, especially to newborns, children, pregnant women, elderly, and other sensitive human receptors (native populations who consume more fish and shellfish) and ecological receptors (especially threatened and endangered species). Identify the concentrations of constituents in coal dust, including cadmium, lead, and mercury, and quantify the concentrations at varying distances from rail track and the predicted exposure to human and ecological receptors at varying distances from rail tracks. For all toxins contained or emitted from coal dust and burning coal—arsenic, mercury, lead, chromium,

Human health

Comments were grouped as follows:

- Vulnerable populations
- Coal and exhaust constituent concentration, characteristics and effects
- Study health related to similar terminals
- Health outcomes from coal dust emissions
- Health outcomes from burning coal and diesel exhaust
- Health outcomes of increased noise
- Loss of life due to emergency response delays
- Health monitoring and responsibility
- Mental health

See also comments in Sections 5.2 Air, 5.3 Energy/greenhouse gases, 5.4 Water resources, 5.7 Aquatic resources, 5.8 Noise and vibration, 5.9 Hazards and risks, 5.10 Land use, shoreline and recreation, 5.11 Tribes, including Indian fishing and fishing treaty rights, 5.13 Transportation, 5.14 Vessel Traffic, 5.15 Social, 5.16 Economics, 5.18 Public services and utilities, 5.19 Human health, and 5.20 Cumulative effects.

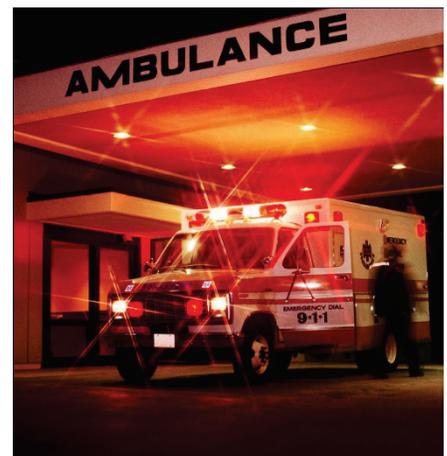
cadmium, selenium, nickel, vanadium, copper, uranium, sulfur compounds, thorium, strontium, antimony, arsenic, manganese, tin, radionuclide, lead, and mercury—investigate how long they remain in the environment and the concentrations at which they cause human neurological damage. Describe the level of exposure for each constituent (and additive or multiplicative effect of combinations of constituents) deemed acceptable to humans and ecological receptors by EPA and state agencies. Describe the synergistic effects of these added pollutants with other existing and anticipated pollutants along these entire rail routes and population centers.

- **Study health related to similar terminals** – Study areas such as Watson and Point Roberts, which have coal terminals, and how the levels of illnesses and respiratory illnesses have changed with the operation of the terminals. Study the existing pollution impacts from the Westshore Terminals and the coal export terminal at Roberts Bank, Delta, British Columbia on the U.S./Canadian border to identify the likely impacts from the proposals.
- **Health outcomes from coal dust emissions** – Disclose all parts or mechanisms of the unit cars that would allow the emission or spillage of coal dust. Address concern about the adequacy of the ventilation systems of Seattle's train tunnel and the health impacts of vented and unvented train exhaust and coal dust. Evaluate effectiveness of the surfactants used to prevent coal dust from spreading. Evaluate impacts on worker's health from the coal sealant spray. Evaluate the potential for coal dust to contaminate soils, and identify effects on food sources, including the potential impacts on businesses that store and process foodstuffs in immediate proximity to the rail lines, home gardens, and foods ingested from home gardens.
- **Health outcomes from burning coal and diesel exhaust** – Address concerns that burning low grade coal (mercury) and that the exhaust from ships would affect air quality and cause/affect other health issues, including chronic obstructive pulmonary disease (COPD), heart problems, lung cancer, emphysema, pulmonary fibrosis (pneumoconiosis), asthma, allergies, and effects on neurological functions, such as Alzheimer's and Parkinson's disease. Address health issues related to indoor air quality at homes along the alignment. Study potential health outcomes, including the increased risk of the following:
 - Bronchitis
 - Black Lung
 - Cardio-pulmonary health issues
 - Cancer
 - Gastrointestinal effects
 - Emphysema
 - Premature deaths



Among the issues raised during the comment period were concerns regarding use of trails.

- Lung cancer
 - Birth defects
 - Reactive airway disease
 - Auto-immune disorders
 - Allergies
 - Strokes
 - Eye health
 - Chemical sensitivities
 - Vital organ damage
 - Multiple chemical sensitivity
 - Mercury poisoning
 - Alzheimer’s from mercury
 - Skin sensitivities, skin diseases
 - Autism spectrum disorders and other learning disabilities in children, including children exposed in utero and while growing up near trains/coal
 - Obesity effects from changes in walkability
 - Kidney disease
 - Stress
 - Impacts to people with scleroderma
 - Idiopathic pulmonary fibrosis
 - Type 2 diabetes
- **Health outcomes of increased noise** – Evaluate the impacts of noise on academic achievement, specifically in reading, problem solving, concentration, emotional development, and concentration in children. Address concerns that rail noise might disrupt schools and recreation, cause sleep deprivation and affect regular home tasks. Consider impact of noise as it related to an increased risk of heart disease, and stroke, elevated blood pressure, restricted blood vessels, irregular heartbeats, and obesity, diabetes, and cardiac disease. Evaluate the risk of additional heart attacks and strokes expected from the increased train traffic and noise. Investigate noise-related health impacts such as digestive problems, increased cholesterol levels, headaches, lower birth rates, birth defects, delayed development in babies, slowed learning in children, respiratory ailments, stomach ulcers, symptoms of tinnitus, and higher murder, suicide, and traffic accident rates. Consider effects of sleep deprivation as a result of train noise, related to levels of irritability, depression, impaired judgment (which can cause accidents), impaired cognitive function, exacerbation of mental health disorders, and anxiety in adults and children.
 - **Loss of life due to emergency response delays** – Quantify the impacts of delay due to train traffic, especially in life or death emergency response situations. Evaluate effects of separation by train tracks of homes from police station, hospital, and high ground of floodplain in Mount Vernon.



Commenters expressed concern about loss of life due to emergency response delays.

- **Health monitoring and responsibility** – Evaluate all health effects and who would monitor them. Assess the increased number of sick days, hospitalizations, emergency room visits, and deaths that would be expected with the proposals, and identify who would pay for the economic costs of these effects. Address concerns about increased costs due to deteriorating health caused by operation of the proposals and how they would be covered. This includes the increased cost of health insurance, public health expenses to treat sick patients without health insurance, the increased cost of life insurance in areas affected by coal dust, decreased productivity due to lost work and school days and forced early retirement due to health conditions. Address concerns about the impacts on veterans, who may have higher health care costs. Require proponents to pay the cost of all health care expenses associated with coal dust impacts.
- **Other health effects** – Evaluate overall mental health impacts on children, including the psychological effect on their trust in parents and elected officials, if this coal terminal is permitted. Evaluate effects of stress caused by waiting at train intersections. Evaluate effects of electromagnetic sensitivity disorder from electromagnetic fields emitted by trains during staging.

5.20 Cumulative effects

- **Vessel traffic** – Evaluate what the cumulative impact of all current and proposed vessel traffic would be, including traffic to and from Canada, traffic through the Salish Sea and traffic through Unimak Pass.
- **Regional impacts** – Consider regional impacts beyond the proposals' footprint in Whatcom County. Analyze the entire marine and rail transportation corridor for coal shipments for impacts, including choke point locations such as Spokane. The Surface Transportation Board may require review of other parts of the corridor. It is ethical and responsible to include communities that have no control in the decision-making process. Evaluate impacts on human and environmental health on either side of the rail line. Analyze marine impacts several miles offshore, along the proposed shipping path. Limit the scope of the EIS to the immediate site of the proposals at the terminal and railroad spur.
- **Global pollution** – Consider global impacts from the proposals in environmental studies, including adverse impacts from the construction of coal terminals and burning of coal in China. Evaluate the increase in worldwide air pollution that would result from the proposals. Consider the possibility to burn the coal in the U.S. Consider the impact of China purchasing dirtier coal from another country if the proposals are not built. Investigate whether adverse effects stemming from coal burning, either within Asia or

Cumulative effects

Comments were grouped as follows:

- Vessel traffic
- Regional impacts
- Global pollution
- All port terminals
- Rail corridor between Montana and Wyoming

See also comments in Sections 5.2 Air, 5.3 Energy/greenhouse gases, 5.8 Noise and vibration, 5.13 Transportation, 5.14 Vessel Traffic, 5.16 Economics, and 5.19 Human health.

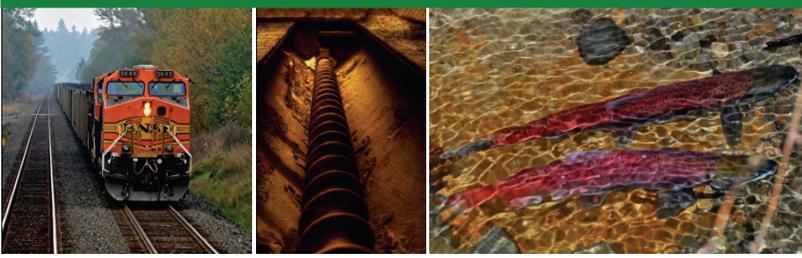
in the U.S. (due to windblown particles originating in Asia), can be remediated or if compensation can be provided.

- **All port terminals** – Address concerns about the cumulative effect of all proposed port terminals in Washington and Oregon. Evaluate the increase in barge traffic through the Columbia River Gorge caused by new coal export terminals. Analyze impacts of coal trains diverting to Canada and transferring cargo to ships at the Westshore Terminal if the Cherry Point facility is not approved.
- **Rail between Montana and Wyoming** – Consider impacts in Montana and Wyoming related to train traffic and adjacent impacts including effects of where the coal would be extracted, including examining environmental and wildlife impacts in the Powder and Yellowstone River valleys. Evaluate impacts of sidings that BNSF has already received approval to construction in western Washington. These sidings would facilitate shipments to the proposed terminal.
- **Global environmental practices** – Study ways for the U.S. to export technical knowledge and expertise, as well as policy regulations targeting increased energy efficiency and renewable electricity, to Asia to promote greater sustainability practices. The GPT proposal should require receiving countries to use best available technology to control carbon dioxide emissions. Study ways for the U.S. to encourage foreign coal users to self-determine and self-supply energy sources and practice energy conservation, rather than harming our environment and landscape to temporarily satisfy their energy needs.



Commenters asked that the EIS include Montana and Wyoming, where the coal would be extracted.

(Photo courtesy of Kimon Berlin)



6. Summary of scoping comments from agencies, Tribes, and elected officials

Federal, state, regional, and local agencies, as well as Native American Tribes provided comments during the scoping process primarily through letter submittals as totaled in Table 6-1. Also, several elected officials and Native American Tribes provided comment through letters but also opted to provide verbal comments at the scoping meetings. All of which are summarized in this section.

6.1 Federal agency scoping letters

The comment letter summaries below provide an overview of each federal agency's comments. Details of the comments are available in the individual comment letters located in Appendix H.

6.1.1 U.S. Department of Agriculture, Forest Service, Columbia River Gorge National Scenic Area

The U.S. Forest Service letter expresses concerns that the increase in rail traffic will increase the probability of new fire starts and wildfires. Other concerns include impacts on air quality and reduced visibility and increased concentrations of particulate matter caused by fugitive dust. The letter asks that the EIS describe how the proposals would be consistent with the goals of the Columbia River Gorge Air Study and Strategy. The letter requests that vegetation control measure be designed in consultation with the U.S. Forest Service to ensure invasive species are not promoted due to vegetation removal. Increased frequency and magnitude of noise is also a concern.

6.1.2 U.S. Department of Commerce, National Oceanic, and Atmospheric Administration, National Marine Fisheries Service

The U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service's (NMFS) scoping letter states that in order for NMFS to meet its mandates and analyze

Table 6-1
Number of comments from agencies, Tribes, and elected officials

Type of entity	Number of comments
Federal	6
Tribal representatives	12
State	11
Regional/Local	51
Total	80

Federal agency scoping letters

- U.S. Department of Agriculture, Forest Service, Columbia River Gorge National Scenic Area
- U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service
- U.S. Department of the Interior, Fish and Wildlife Service
- U.S. Department of the Interior, National Park Service
- U.S. Environmental Protection Agency
- U.S. Department of Housing and Urban Development

the impacts associated with the proposals, the agency will need detailed information in the EIS and supporting documents. NMFS requests an accurate and thorough description of the environmental baseline. The letter also states that effects from the transportation (vessel and rail) of the products are considered interrelated actions and require analysis under Section 7 of the Endangered Species Act (ESA). The letter requests information about transportation corridors between the pier and Exclusive Economic Zone (EEZ), vessel characteristics, and conservation measures to minimize collision risks of whales and rail routes, specifically those adjacent to the Columbia River and along Puget Sound. The letter also requests information on pile driving sound, conservation measures to reduce effects/transport of coal dust from wind drift and estimated carbon output from burning the maximum capacity of coal shipped overseas.

The letter requests alternatives and measures to minimize effects from every part of the proposed project action, interrelated action, and future effects. NMFS would like information on how the Applicants plan to minimize impacts on wetlands and reduce the effects on water quality. Because the proposal is part of a larger action (transport of products), NMFS requests that the Applicants propose alternatives to reduce effects (for example, from coal dust, vessel strikes, and vessel wake) throughout the transportation corridor to the edge of the EEZ. NMFS requests that the Applicants conduct baseline surveys of coal dust and monitor coal dust throughout the life of the proposals to make sure minimization measures are effective, and have a contingency plan if they are not.

NMFS requests that the Applicants take steps to reduce the carbon footprint caused by the operation of their facilities, and, because the Applicant cannot control the burning of coal overseas and the associated carbon footprint, the Applicant should propose measures to reduce carbon emissions within their company.

6.1.3 U.S. Department of the Interior, Fish, and Wildlife Service

The U.S. Department of the Interior, Fish and Wildlife Service scoping letter represents the agency's preliminary comments on the proposed action. The scoping letter provides comments on the following subject areas:

- Action/affected area
- Federally listed species
- Fish
- Birds
- Wildlife
- Vegetation – terrestrial
- Vegetation – aquatic (marine and fresh water)
- Contaminants
- Cumulative Effects

In describing potential impacts related to the proposals, the comments identify several plant and animal species and habitats that may be affected. The agency requests an analysis of the direct and indirect effects related to in-water and in-air noise, with specific thresholds provided; contaminants from materials, products, and maintenance; loss of habitat; loss of habitat connectivity; and train collisions with wildlife. The agency requests that the analysis presents information on the extent, duration, magnitude, and frequency of effects with and without conservation measures. The agency requests review of compensatory mitigation plans and recommends that any mitigation action be implemented prior to any impacts in order to reduce the effect of the action.

6.1.4 U.S. Department of the Interior, National Park Service

The U.S. Department of the Interior, National Park Service scoping letter comments on five general categories: the scope of the EIS, air quality impacts, impacts on aquatic habitats and wildlife, effects on recreational experiences of park visitors, and climate change. The agency states that the Corps is obligated to have a programmatic EIS prepared to assess the cumulative effects of all five export terminal projects in the region. Further, the agency states that the programmatic EIS should evaluate all effects of the coal export process starting with the railroad transport of materials from the mining sources to the emissions produced by Asian power plants. The agency will refrain from additional comments regarding the specific public lands it manages until the transport routes are identified.

The agency is concerned that air pollutants associated with coal export and consumption will degrade visibility, affect sensitive waterbodies, and contribute to mercury contamination in park wildlife. The agency requests an analysis of the effects of the proposals on air quality, including haze in Clean Air Act Class I areas, coal dust impacts, vehicle emissions, and emissions from coal combustion in Asian power plants. The agency requests that the analysis include all of their managed lands within 50 kilometers of the rail lines and shipping channels and within 100 kilometers of the terminals.

The agency expressed concern about impacts on water quality, aquatic life, aquatic habitats and wildlife from coal dust, diesel emissions, potential spills, train derailments, and train traffic. These concerns extend across Puget Sound, and the Columbia River, as well as Glacier National Park. The agency directly mentioned the following species: grizzly bears, orca whales, salmon, and steelhead.

The agency requests the analysis of the impact of increased train traffic and ship traffic, and the resulting effects on air quality, water quality, and wildlife on park visitor use and enjoyment of National Park Service areas.

The agency is concerned about the effects of the proposals and other coal export projects on greenhouse gas emissions and climate change. The agency requests that the EIS evaluate the potential effects of the coal export process and emissions generated from Asian power plants on climate change.

6.1.5 U.S. Environmental Protection Agency

The EPA scoping letter requests that the EIS examine the direct environmental impacts from constructing and operating the new terminal and expanding the existing rail spur line, including the impacts on onsite wetlands, streams, nearshore habitat, and habitat important to herring and salmon. To comply with Council on Environmental Quality regulations (Section 1502.16; to consider other effects reasonably foreseeable), EPA also requests evaluating impacts along the full route associated with the transportation of goods to the terminal, including the potential increases in fugitive coal dust and diesel emissions and related human health impacts on communities along the proposed routes; the potential effects in the U.S. from combustion of the exported coal (mercury, particulate matter, and ozone precursors released when coal is burned) because the combusted material can travel long distances in the air; and the life cycle of greenhouse gas emissions associated with the proposal. EPA states that there are well developed and available methods to conduct these analyses.

EPA also requests that the cumulative effects analysis should include increases in regional train traffic and related air quality effects on human health and the potential for effects on human health and the environment from increases in the long-range transportation of air pollution, including greenhouse gas emissions.

6.1.6 U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) scoping letter requests that the EIS analyze noise-related impacts from the additional freight trains along the entire route because communities along the routes could be at risk of losing HUD funding for projects due to increased noise from train traffic. When HUD funds projects, the noise levels need to be less than 65 decibels at the project site or extensive noise mitigation would be required. The letter suggests using HUD's 1991 Noise Assessment Guidelines (HUD-953-CPD(1)) and the 2006 Federal Transit Administration Noise and Vibration Impact Assessment Manual (FTA-VA-90-1003-06) to quantify impacts.

Because the GPT proposal is one of three deep-water ports with permit applications in Washington and Oregon, the scoping letter requests that the EIS's cumulative impact assessment address the total number of trains that would travel to all three ports because the total number of

trains passing through the region could be many times more than the number identified for just the GPT.

6.2 Tribes scoping letters and scoping meeting comments

The comment letter summaries below provide an overview of each Tribe's comments. Details of the comments are available in the individual comment letters located in Appendix I. Summaries of verbal comments from Tribal representatives at scoping meetings are also included below.

6.2.1 Lummi Indian Business Council

The Lummi Indian Business Council letter provides a detailed description of and an evaluation framework for potential impacts on the Lummi Nation. The potential impacts relate to unavoidable and unacceptable interference with treaty rights and irreversible and irretrievable damage to the spiritual values of the Lummi People and their ability to exercise treaty rights throughout the "usual and accustomed grounds and stations" (U&A), and traditional areas. The potential impacts are organized as follows:

- Cultural properties/cultural resources
- Fishing interference
- Increased hazardous material and oil spill risk
- Water supply/Nooksack River in-stream flows
- Forage fish habitat
- Finfish and shellfish habitat
- Climate change
- Carbon balance/ocean acidification
- Acid rain/acid deposition
- Economic impacts-market and non-market goods and services
- Ballast water (water quality and invasive species)
- Stormwater
- Wetlands
- Geologic process-littoral drift
- Public health and safety
- Environmental justice
- Cumulative effects

For each impact there is a summary of the issues with a rationale for study (issue definition/rationale), a summary for the extent and geographic scale for the evaluation (extent/geographic scale of evaluation) and a summary of potential significant unavoidable adverse impacts (significant unavoidable adverse impacts). The letter also notes that although separated as distinct potential impacts, many of the potential impacts are interrelated.

In addition to potential impacts, the letter requests that the EIS address at least the following alternative actions:

Scoping letters from Lummi Nation Schools

Approximately 150 letters were submitted from the youth of the Lummi Nation. These letters overwhelmingly expressed concern for the proposal's impact on: the marine waters that are so integral to the Lummi culture. As stated in Samantha Wilson's letter: "We've all been raised as Lhaq'te mish people, meaning 'People of the Sea.' We live off the sea, it's where our food comes from, it's where we come from. We've been taught to go fishing, crabbing, make canoes, and numerous other things, but most importantly we've been taught to protect our Schelangen which is 'our way of life,' our culture, and our people."

In addition, many of the student's letters indicated that their families' livelihood relies on fishing, crabbing, and clamming in the waters near Cherry Point. As stated in Savannah LaClair's letter: "The water is a part of our culture, we use it to fish, crab clam dig, canoe race, and for the canoe journey. My grandfather and most of my uncles fish crab, and clam dig."

Another major concern expressed in the student's letters is the proposals' impact on the burial grounds at Xwe'chi' eXen (Cherry Point). As stated in Enrique Medina Sturgeon letter: "Our ancestors have been buried there for at least 3,500 years, 175 generations of families who have lived there. To have a train run through it and dump coal on it to be transported to China would not be right."

Other concerns expressed in the student's letters included the effects of burning coal on air quality and global warming.

Appendix I contains the letters from the Lummi Nation Schools, as part of the Native American Tribe comments record.

- No action
- Establish a historic/cultural district
- Establish a Lummi cemetery

A short description of these actions is provided in the letter.

6.2.2 Che Leah Ten Clifford Cultee, Chairman for the Lummi Nation

At the Bellingham scoping meeting, the chairman for the Lummi people spoke out regarding concerns for future generations and the need to protect natural resources for the livelihoods, sustenance, and for ceremonial practices.

6.2.3 Jay Julius, Lummi Nation

At the Bellingham scoping meeting, Mr. Jay Julius voiced concerns on behalf of more than 5,000 Tribal members. He expressed opposition to the proposal and concerns in terms of the Lummi ancestral knowledge and the potential impacts with regard to fishing and the culture and history of fishing. He stated that the EIS should study the spiritual impacts and refer to the historical impacts of boarding schools on the Indians to determine the spiritual and soul impacts on the Lummi people. He stated that the GPT proposal site encompasses the most studied archaeological burial site in Washington state.

6.2.4 Jeremiah Julius, Lummi Nation

At the Seattle scoping meeting, Mr. Jeremiah Julius voiced concerns regarding the documented archaeological sites and the damage that has occurred to these sites. He expressed demands that a soul study be done to evaluate the impact that uprooting ancestors from this site will have on the 5,000 plus Tribal members.

6.2.5 Makah Tribal Council

The Makah Tribal Council letter requests that the EIS include an analysis of risks associated with construction in critical salmon and herring habitat; the shipping of coal through the Makah treaty area; and the impact of the burning of coal on the Makah treaty protected resources. It specifically asks that the EIS evaluate the cumulative effects of vessel traffic on the likelihood of a spill in the Makah treaty, including risks related to the other coal terminal projects in the Pacific Northwest seeking permits from the Corps.

The letter also recommends that the Corps mandate that the project proponents contribute to the vessel traffic study being led by investigators at George Washington University. The preliminary findings from this analysis has been included as an attachment to the Makah Tribal Council letter.

6.2.6 Chad Bowechop, Manager Makah Office of Marine Affairs

At the Seattle meeting, Mr. Bowechop requested that the scope of the EIS recognize the sovereign nature of the 1855 treaty of Neah Bay and that “moreover, the spiritual beliefs that we are inextricably connected to the environment.” He stated that the EIS must include analysis of risks associated with both the shipping and burning of coal and their effect on treaty-protected resources.

6.2.7 Nisqually Indian Tribe

The Nisqually Indian Tribe letter requests that the EIS analyze the impacts on fisheries habitat and the Nisqually Tribes’ treaty rights, including the fishing rights of the Nisqually Indian Tribe and the risks and consequences of an accident associated with the increase of train traffic, specifically the consequences that could result from substantial amounts of coal being dumped into the Nisqually River or Puget Sound. The letter also requests that the agencies acknowledge that the Nisqually Indian Tribe, and other Tribes along the route of travel, may have valuable cultural resources at risk. The letter also requests that the agencies address possible mitigation of the associated risks, including rebuilding the route along Puget Sound or relocating the route away from Puget Sound.

6.2.8 Regional Tribal Operations Committee

The Regional Tribal Operations Committee letter requests that a comprehensive EIS be completed that analyzes the displaced treaty fishing sites; impacts on cultural resources; levels of dust and diesel emissions; pollution on groundwater and rivers in the vicinity of the mining activity on public lands; the real risks of derailments in traditional hunting and gathering sites; and the unsafe navigation conditions for Tribal fishers and others on the river. The letter also expresses the need for government-to-government consultation with Tribal communities affected by the proposal. The letter also provides a detailed request for an analysis of the following:

- Environmental justice
- Cultural and fishing sites
- Trains
- Traffic
- Marine vessel traffic
- Fisheries
- Coal dust
- Air quality
- Noise
- Public health
- Derailments
- Global impacts

6.2.9 Samish Indian Nation

The Samish Indian Nation letter describes concern about impacts on cultural resources and traditional cultural properties, access to Tribal fishing grounds, subsistence fishermen, and increased mercury contamination in salmon. It also identifies concerns related to diesel emissions and coal dust, increased toxic deposition, and ocean acidity from coal burning, and wind-driven transport.

6.2.10 Leonard Forsman, Suquamish Tribe

The Suquamish Tribe letter requests that the potentially significant issues be analyzed in depth, both specific to the proposals and cumulatively during construction, operation, and maintenance. Issues listed include the following:

- Treaty-reserved fishing areas
- Habitat structures function and processes
- Loss and alteration of nearshore habitat and wetlands
- Effects to the behavior and migration of fish
- Density and distribution of eelgrass and macroalgae
- Hydrodynamic, littoral, and geomorphic conditions
- Modifications to sediment transport and habitat-forming processes
- Effects of noise
- Effects of artificial light
- Vessel and rail traffic
- Risks of spills
- Risks of invasive aquatic and plant species
- Air, water, and sediment quality
- Cultural resources
- Human health
- Climate change

6.2.11 Swinomish Indian Tribal Community

The Swinomish Indian Tribal Community letter expresses concerns regarding the potential adverse impacts of the proposal on the health of Tribal members; Tribal treaty secured fishing resources; the ecosystem and air shed of the Salish Sea; the Swinomish Reservation; and the usual and accustomed fishing and hunting areas. The letter asks that the lead agencies pursue a thorough and broadly scoped analysis of cumulative impacts, including the construction and operation of the port facility, associated rail and marine transportation, as well as the cumulative impacts in conjunction with the multitude of proposed ports along the west coast. The letter also provides a detailed request for an analysis of the following:

- Displacement of Tribal fishing activities
- Adverse impact on Tribal fisheries resources resulting from adverse habitat modifications
- Marine habitat effects of the dock

- Coal dust in the nearshore environment
- Pollutants concentrated at dock
- Environmental risks associated with train derailment
- Impacts on Tribal economic interests
- Risks associated with additional marine vessel traffic
- Ballast water
- Oil spill response
- Queuing/anchoring/vessel movement of ships going into port
- Baseline water quality studies
- Disclosure of stormwater standards and coal pile discharge standards
- Coal car stormwater releases
- Stormwater discharge at the site
- General construction National Pollutant Discharge Elimination System (NPDES) permit
- Freshwater and wetlands
- Air quality impacts

6.2.12 Deborah Lekanof, Swinomish Indian Tribal Community

Ms. Lekanof voiced the trust obligations between the Corps and the Tribal communities at the Seattle scoping meeting. She reminded the Corps of that trust responsibility of today's and tomorrow's generations of the Swinomish people and stated that there is a need to ensure that we all live a healthy life-style, that our community is protected, that we are able to say the mighty salmon are still here hundreds of years down the road.

6.2.13 The Tulalip Tribes

The Tulalip Tribes letter expresses concerns about impacts on the exercise of Tribal treaty rights; a known archaeological and burial site; regional and global air quality issues; the health and safety of the residents of the Tulalip Reservation; and the existing economic enterprises and future economic growth for the Tulalip Reservation. The letter requests that the EIS include an analysis of the following:

- Direct impacts on Tribal fishing opportunities, including impacts from the increase in shipping traffic through the Tribes' usual and accustomed fishing areas.
- Impacts from marine vessel operations, including the potential for accidents, impacts on marine mammals and operations of the ballast tanks

- Port impacts, including over water coverage of the wharf, potential coal spillage and wetland and stream channel impacts from upland development.
- Rail impacts, including impacts and risks from train derailments.
- Tribal burial grounds, including the direct impact on a known burial site for the Lummi Tribe.
- Air quality, including coal dust, engine exhaust and the emissions from burning the coal in Asian countries.
- Tulalip Reservation and surrounding community, including impacts on local businesses, increased loss of life and property on an annual basis, job losses, increased traffic congestion and impacts on mass transit operations and ridership.

6.2.14 Mel Sheldon, Chairman of Tulalip Tribes

At the Seattle scoping meeting, Mr. Sheldon expressed his opposition based on the belief that the proposal will damage the natural and cultural resources or diminish existing jobs in the region. He also stated that he will not tolerate impacts on the health of Tribal members and on the treaty to reserve fishing, hunting, and gathering rights. He expressed concerns for the natural environment; interference with treaty fishing areas; contamination of waters, lands, and traditional foods; and impacts on air quality.

6.2.15 Confederated Tribes and Bands of the Yakama Nation

The Confederated Tribes and Bands of the Yakama Nation letter requests that the agencies conduct a comprehensive, region-wide environmental analysis of all coal export proposals in the Northwest. It also asks that the scope of the EIS include an evaluation of all potential impacts on the cultural and treaty-reserved resources, environment, public health and safety, and economies of the Yakama Nation from the coals origins in the Powder River Basin through its homelands, to Asia, and back. Other requested analyses include the following:

- Impacts from the ships' air emissions, ballast water, coal escapement, potential spills, etc. in terms of damages to salmon and the larger ocean environment
- Cultural resources
- Impacts from the increased rail traffic on Tribal fisheries, customers, and Tribal members on and near the Yakama Reservation
- Analysis of the likelihood, frequency, and consequences of coal train derailments and shipping spills
- Analysis of emissions from rail and ship traffic
- Analysis of the amounts and effects of fugitive coal dust

6.2.16 Kristina Proszeck, Yakama Nation

At the Seattle scoping meeting, Ms. Proszeck asked the federal government to conduct a comprehensive region-wide analysis of the coal export proposals in the Northwest in addition and prior to completing specific EISs for each proposed terminal. She also asked that the scope of the EIS include the evaluation of all potential impacts on public health, safety, the environment, and treaty-reserve resources from the coal's origins in the Powder River Basin through the homelands to Asia and back. The Yakama Nation also requests a public hearing Central Washington from the Columbia River north where Tribal members and others stand to be affected by the proposal.

6.3 State agency and elected official scoping letters

The comment letter summaries below provide an overview of each agency's and official's comments. Details of the comments are available in the individual comment letters located in Appendix H.

6.3.1 Washington State Department of Natural Resources

The Washington State Department of Natural Resources (DNR) comment letter describes its role as manager of state trust lands and state-owned aquatic lands, and administrator of state Forest Practice Rules. The letter further explains that the proposed wharf and trestle would be located on state-owned aquatic lands (Cherry Point Aquatic Reserve), and a DNR lease will be required. It also states that a Forest Practice Application will need to be submitted, and the existing DNR easement at Elliott Yard will need to be amended to address project modifications. The letter includes an attachment that identifies project alternatives for the pier alignment and design, vessel traffic, vessel operations, and rail corridor expansion. The attachment also requests that impacts be evaluated at the Cherry Point Reach, state-managed lands in the Puget Sound Region and state-managed lands statewide. Specifics are provided for each of the following areas:

- Earth, including geologic hazards
- Plants and animals, including shading, construction, operational noise, artificial lighting, aquatic vegetation biological resources
- Air
- Water, including hydrological dynamics, cumulative impacts, vessel fueling and pumpouts, coal dust and other commodity material drift, ballast water, invasive species, stream passage structures
- Environmental health, including toxic chemicals
- Land and shoreline use, including sea level rise
- Transportation, including marine vessels

State agencies and elected officials

Written comments on the proposed action were provided by nine state agencies and three elected bodies:

- Washington State Department of Natural Resources
- Puget Sound Partnership
- Washington State Department of Archaeology and Historic Preservation
- Washington State Department of Health
- Washington State Department of Commerce
- Washington State Department of Fish and Wildlife
- Washington State Department of Agriculture
- Washington State Department of Transportation (WSDOT)
- Washington State Utilities and Transportation Commission
- Senator Christine Rolfes, 23rd Legislative District
- State of Washington House of Representatives
- Governor Matthew Mead, State of Wyoming

- Historical and cultural preservation
- Recreation
- Agricultural crops
- Natural resources, including forests
- Public services and utilities, including fire risk

6.3.2 Puget Sound Partnership

The Puget Sound Partnership letter describes its role as a state agency and a community of citizens, governmental agencies, Tribes, scientists, and businesses, charged with recovering the health of Puget Sound. It refers to the Puget Sound Action Agenda, which identifies strategies and actions for protecting and restoring Puget Sound, and requests that the EIS consider this Agenda. Detailed comments were attached. The agency's comments are categorized by the Puget Sound Partnership target areas as follows:

- Protect and restore habitat
- Water quality
- Species and food webs
- Healthy human populations
- Human quality of life

6.3.3 Washington State Department of Archaeology and Historic Preservation

The Washington State Department of Archaeology and Historic Preservation letter requests a proactive consultation plan to assure all the affected communities are identified early and are offered an informed consultation regarding the cultural resources that are at risk and methods to avoid, minimize or mitigate impacts. Affected communities include National Register listed, or eligible historic districts, Main Street program communities, and those jurisdictions with local historic preservation programs (Certified Local Governments) that may have locally designated historic properties along the rail routes. The letter also expresses the need to address communities across the state that will witness changes in rail traffic, including additional track right-of-way, spurs, vibration to historic structures, noise on historic districts, and risks due to accidents. The information will be critical in development of the Area of Potential Effect (APE) for Section 106/National Historic Preservation Act compliance.

6.3.4 Washington State Department of Health

The Washington State Department of Health letter urges the use of a Health Impact Assessment tool so that communities and decision-makers can objectively evaluate the potential health effects of the proposal. The letter requests that the EIS address the potential health impacts and mitigation strategies for the entire length of the statewide rail corridor, in addition to those at the site, and asks that the

EIS address the health impacts and risk reduction strategies in the Washington shipping lanes proposed for the proposal. It includes an attachment with detailed comments and recommendations for the following health topics:

- Air quality – dust
- Air quality – diesel exhaust
- Air quality – vehicle idling
- Noise
- Railroad traffic – access to emergency care
- Railroad traffic – impact of train derailment on the emergency medical services and trauma system
- Railway traffic – pedestrian safety
- Railway traffic – recreation
- Economic development and employment
- Community wellness

The letter also includes a list of studies that may be useful for getting more information on the health topics discussed in the agency's comments.

6.3.5 Washington State Department of Commerce

The Washington Department of Commerce letter encourages the Co-Lead Agencies to scope the analysis so the process is efficient in use of time and resources and effective in meeting requirements under state and federal law for a full and fair analysis of impacts. The letter recommends that the analysis not establish new precedents under state law that would unduly burden a wide variety of future projects. Specific comments are categorized according to the following issues:

- Public benefits of the terminal proposal
- Direct, indirect, and induced jobs and income during construction and operation
- Incremental state and local tax revenues during construction and operations
- Potential reductions in shipping costs for bulk commodities produced within Washington state due to the added capacity from the proposal
- Public costs ("externalities") of the proposal
- Environmental impacts along rail lines and their effect on property values and human health
- Auto and truck congestion on road and ferry networks

- Rail car congestion on rail networks

6.3.6 Washington State Department of Fish and Wildlife

The Washington State Department of Fish and Wildlife letter lists the agency's regulatory authority and includes detailed comments organized by facility and affected resource as follows:

- Upland facility design – streams, wetlands, wildlife, fish, coal dust, noise, stormwater
- Upland facility construction – streams, wetlands, wildlife, fish, noise, stormwater
- Upland facility operation – streams, wetlands, wildlife, fish, coal dust, noise, stormwater
- Marine trestle/wharf design – marine vegetation (shading), juvenile salmon, herring, sediment and water quality, stormwater, materials handling (conveyor containment), littoral drift (wave dampening), wildlife, surf smelt, and sand lance
- Marine trestle/wharf construction – marine vegetation, juvenile salmon, herring, piling, water quality, wildlife
- Marine trestle/wharf operations – herring behavior, sediment and water quality, stormwater, wildlife, materials handling (conveyor containment), littoral drift (wave dampening)
- Vessel (ship) operations – vessel traffic, vessel fueling, oil spill response, vessel berthing operations, vessel operations while berthed, vessel operations (marine life), ballast water, hull fouling
- BNSF infrastructure design
- BNSF construction and operation
- Climate change – GPT, multiple west coast shipping terminals
- Cumulative impacts – west coast shipping terminals, BNSF

Each topic includes a statement that describes Washington State Department of Fish and Wildlife's concern, a list of studies needed, a suggested impact/study area, suggested mitigation, and a list of references.

6.3.7 Washington State Department of Agriculture

Washington State Department of Agriculture's letter requests an evaluation of secondary agricultural impacts along any proposed route to the new terminal. This could include an evaluation of wait times for export access to the Port of Seattle; any changes in rail capacity for commodities that normally move by rail to market or for export; changes in export commodity port capacity; or potential impact (particularly changes to air or water quality) on agriculture activities

along the planned route. It also requests that the EIS cover the entire in-state rail route of the proposal, from where it enters Washington state to the final terminal location at Cherry Point.

6.3.8 Washington State Department of Transportation

WSDOT's letter focuses comments on potential impacts from increased rail traffic on state highway and ferry systems, the state's freight rail system, passenger rail service, and on SR 548 in Whatcom County. As a general comment, it requests that the EIS evaluate the cumulative effects on the state's transportation system in light of other similar proposals. Specific requests for analysis include the following:

- Clarify train traffic.
- Analyze site transportation impacts in a transportation impact analysis.
- Analyze impacts on the state highway system based on an assumed route which identifies 12 state highway-railroad grade crossings, as well as an additional 17 highway intersections and interchanges where operations may be affected due to delays at nearby highway-railroad grade crossings.
- Analyze impacts on the Washington State Ferries. WSDOT requests an analysis of Washington State Ferries' capabilities at the Edmonds Ferry Terminal and marine traffic operations in the San Juan Straits.
- Analyze impacts on the freight system to address expected bottlenecks and capacity constraints.
- Analyze impacts on the Amtrak Cascades Intercity Passenger Rail Service to address current and future passenger-rail service commitments that start in 2017.
- Analyze impacts on the WSDOT wetland mitigation site near the materials handling and storage yard and assess whether there will be changes to the hydrology at this location that could compromise SR 548 operations.

The letter also includes an attachment that lists state highway railroad grade crossings and potentially affected intersections/interchanges along possible GPT-bound rail routes.

6.3.9 Washington State Utilities and Transportation Commission

The Washington State Utilities and Transportation Commission (UTC) letter describes its responsibility under state law for ensuring the safety of the more than 2,600 public railroad crossings in Washington state. It states that the impact of increased train traffic must be carefully evaluated from a safety standpoint and that appropriate planning must be undertaken to mitigate any risks identified. The letter requests that

the EIS evaluate the potential impact of the proposal on the safety of the public on and around all railroad lines and crossings that would be used to deliver coal or other commodities to the terminal. It also requests that the EIS evaluate potential disruption to communities and examine whether the additional train traffic would significantly increase wear and tear of existing crossings, necessitating increased inspections by UTC rail safety staff and increased maintenance costs for the railroads. Lastly, the UTC would need to be prepared to review proposals from the railroads to modify train speeds within cities and towns; although they have very little direct jurisdiction over train speeds because of federal preemption, they are responsible for reviewing and commenting on any train speed increase proposed by a railroad.

6.3.10 Senator Christine Rolfes, 23rd Legislative District

Senator Christine Rolfes' letter is confined to the impacts upon the ferry system and the communities that are dependent upon it. Specific concerns relate to the ferry terminal in Edmonds in Snohomish County and how the increase in rail traffic could disrupt ferry service, with significant impacts on resident, businesses, and the West Sound communities that rely on this crossing. The letter also requests that the EIS analyze associated economic impacts if the Kingston-Edmonds ferry route were to become unusable due to rail traffic and the importance of evaluating the need for rail infrastructure alterations to ensure that these longer, heavier trains do not compromise this infrastructure.

6.3.11 State of Washington House of Representatives (signed by 12 representatives)

The letter submitted by Representative Reuven Carlyle on behalf of 12 members of the State of Washington House of Representatives requests that the EIS analyze impacts statewide and cumulatively with other proposed coal export projects in the Pacific Northwest. The letter requests the following analyses:

- Traffic congestion throughout Washington state, including impacts on emergency response times, access to businesses, and the movement of goods and people by rail or other means.
- Impacts on the ferry system from increased train or marine vessel traffic.
- Negative effects on property values from traffic, vibration, safety, noise, and pollution, as well as the associated impacts on state and local tax revenue.
- Economic impacts such as changes to local and regional job growth, potential impacts on economic development projects, and other employment changes.

State of Washington House of Representatives

The State of Washington House of Representatives submitted a letter from the following elected officials:

- Rep. Reuven Carlyle – 36th District
- Rep. Joe Fitzgibbon – 34th District
- Rep. Kristine Lytton – 40th District
- Rep. Chris Reykdal – 22nd District
- Rep. Gerry Pollet – 46th District
- Rep. Ruth Kagi – 32nd District
- Rep. Laurie Jinkins – 27th District
- Rep. Jessyn Farrell – 46th District
- Rep. Cindy Ryu – 32nd District
- Rep. Gael Tarleton – 36th District
- Rep. Marcie Maxwell – 41st District
- Rep. Jeff Morris – 40th District

- The costs associated with infrastructure improvements, maintenance, and mitigation measures.
- The long-term viability of coal as a significant economic driver.
- Greenhouse gas emissions and impacts on global climate change.
- Air and noise pollution and associated health impacts along the rail corridor.
- Impacts on the marine environment from disturbance of the seafloor, increased turbidity, underwater noise, shading, water pollution, nighttime lighting, potential vessel accidents and spills, and coal dust.

6.3.12 Governor Matthew Mead, State of Wyoming

The Governor of Wyoming's letter expresses concern that conducting an area-wide EIS that includes Asia, world-wide greenhouse gas emissions, climate change, and similarly broad and diverse areas will result in less-informed decision-making.

6.4 Local agency and elected official scoping letters

Comments on the proposed action were provided by 32 local agencies from several counties in Washington as well as counties in Montana, Idaho, and Oregon. Additionally, comments were received from three regional air agencies and 16 elected officials. The comments, including verbal comments from local agency representatives and elected officials at scoping meetings, are summarized below. Each of the comment letters and transcripts are available in Appendix H.

6.4.1 Air Agencies

6.4.1.1 Northwest Clean Air Agency

The Northwest Clean Air Agency (NWCAA) letter requests that the EIS provide the most comprehensive information and analysis related to air quality emissions and potential impacts in Whatcom, Skagit, and Island counties from any product that travels through or is handled by the proposed terminal and potential mitigation measures. Comments are grouped as permit-related comments and comments related to overall protection of air quality within NWCAA's three-county jurisdictional area.

6.4.1.2 Puget Sound Clean Air Agency

The Puget Sound Clean Air Agency letter provides scoping comments to ensure the EIS thoroughly identifies and analyzed the air quality and climate effects in King, Kitsap, Pierce, and Snohomish counties. Comments are grouped according to the following areas:

Local agencies and elected officials

Comments on the proposed action were provided by 32 local agencies from 10 counties in Washington, as well as counties in Montana, Idaho, and Oregon. Additionally, comments were received from three regional air agencies and 16 elected officials.

- Whatcom County, Wash.
- San Juan County, Wash.
- Skagit County, Wash.
- Snohomish County, Wash.
- King County, Wash.
- Pierce County, Wash.
- Thurston County, Wash.
- Clark County, Wash.
- Skamania County, Wash.
- Spokane County, Wash.
- Hood River County, Ore.
- Bonner County, Ida.
- Park County, Mont.
- Gallatin County, Mont.

- The potential effect on resources and extent of analysis of those resources
- Measures to avoid, minimize, and mitigate effects of the proposal
- Significant unavoidable adverse impacts
- Alternatives

6.4.1.3 Spokane Regional Clean Air Agency

The Spokane Regional Clean Air Agency letter provides comments that relate to the potential air quality impacts caused by additional trains traveling through Spokane County. Comments are grouped according to the following concerns:

- Increased diesel particulate matter emissions in Spokane County from additional locomotives.
- Increased emissions at BNSF railyard in Spokane caused by additional trains.
- Increased emissions caused by vehicle idling at railroad crossings.
- Compliance with general conformity regulations.
- Washington State Implementation Plan.

6.4.2 Whatcom County

6.4.2.1 City of Bellingham

The City of Bellingham submitted two scoping letters. The first letter requests that a cumulative effects analysis of all currently proposed coal export facilities and/or dry bulk commodity terminals within Washington and Oregon be completed. It also asks for an analysis of impacts on the health and welfare of the citizens of Bellingham, impacts on existing freight train and passenger train service and an analysis that includes all other elements of the environment as specified in Washington Administrative Code (WAC) 197-11-444. Other specific elements requested for analysis are categorized in relation to the City's Legacies and Strategic Commitments, as follows:

- Healthy environment legacy
- Vibrant and sustainable economy
- Sense of place
- Safe and prepared community
- Mobility and connectivity options
- Quality, responsive city services

The second letter requests an analysis of the suitability of the proposals in relation to funded and completed at-grade improvements, as well as several projects specified in the city's adopted 6-year Transportation Improvement Program (TIP). The letter also requests an analysis of the city's Climate Action Plan and how increased gate down times at six specifically listed at-grade crossing locations could affect the plan. The

letter also suggests a number of alternatives to the proposals, mitigation measures, revisions to the purpose and need statement, and a request to perform an indirect effects analysis (as defined in 40 Code of Federal Regulations [CFR] Section 1508.8). Also attached to the letter was Bellingham City Council Resolution 2012-22, which requests analysis of certain potential on- and off-site impacts associated with the GPT as part of the SEPA and NEPA processes.

6.4.2.2 Bellingham City Council

The Bellingham City Council letter requests that the scope of the EIS include an analysis of impacts related to climate disruption, increased level of toxic metals in waterbodies, and increased acidification of waterbodies. The letter specifically requests that the EIS evaluate the foreseeable impact of coal consumption on global climate change in addition to the carbon footprint of the mining and shipping operations. The letter also requests that these effects be studied in conjunction with the several other proposed coal shipping facilities in Washington state to determine the cumulative impacts that would be felt at the local level in Bellingham and Whatcom County and the entire region. The letter includes a detailed list of specific comments regarding the adverse impacts from climate disruption, including loss and population disruptions of plant species; disruption, loss, and seasonal shifts in precipitation; lower in-stream flow; higher average water temperature; changes in rainfall, snow pack, and spring run-off; change in forest productivity and ecology; and sea level changes. Other concerns are expressed about increased exposure to toxic metals, such as mercury, via atmospheric release.

6.4.2.3 Port of Bellingham

The Port of Bellingham's letter expresses its direct interest in understanding and mitigating transportation impacts on public properties owned by the port, notably in the City of Bellingham's Fairhaven and Waterfront Districts but also, in general, impacts that may accrue at various crossings throughout the county and cause notable delays to commerce on county roadways. The letter requests that the EIS include a complete analysis and possible mitigations for traffic impacts that consider both the additional burdens from auto traffic and the effects of increased rail traffic throughout the county.

6.4.2.4 City of Blaine

The City of Blaine's scoping letter provides a list of issues related to changes in rail traffic, both frequency of trains and changes in traffic patterns. The comments are summarized by issue, NEPA/SEPA element and mitigation. Issues relate to increased frequency of blockage at existing crossings and traffic delays (specific locations are listed), increased use of sidings, and potential increase in demand for services related to temporary construction crews.

6.4.2.5 City of Ferndale

The City of Ferndale scoping letter requests a cumulative impact assessment on the immediate and surrounding area of the proposals. It also requests an analysis of transportation impacts, including impacts on the city's surface streets (listing five at-grade crossings in the city), impacts from rail traffic in times of emergency, and impacts on students within walking distance of public schools. The letter also asks for clarification with regard to other improvements and expansion to the railway that might be necessary to serve this proposal or other projects. Other subjects requested for analysis include land use, the natural environment, noise and vibration, and safety.

6.4.2.6 Mayor Gary Jensen, City of Ferndale

At the Ferndale scoping meeting, Mayor Jensen stated that the City of Ferndale's support for the proposals is not unconditional, and it never has been. He expressed the desire for the proposals to be good neighbors and treat the environment in a sound way. He also requested that the agencies set up regulations that would support this desire.

6.4.2.7 Whatcom County Marine Resources Committee

The Whatcom County Marine Resources Committee letter identifies five topics of concern that it would like addressed in the EIS.

- Artificial night lighting
- Coal dust/cargo spillage
- Habitat impacts
- Underwater noise
- Vessel traffic

Each of the five topics is presented in alphabetical order as separate sections in the letter. Each section contains a statement of concern, rationale for concern, applicable regulations, recommendations, and citations/reference documents.

6.4.2.8 Ferndale School District

The Ferndale School District's letter requests that the following four health questions be fully studied as a part of the EIS:

- What impact would coal dust lost en route have on the students and staff of the school district?
- What impact would increased diesel particulates have on the students and staff of the school district?
- What impact would increased noise pollution have on those students and staff of the school district with noise sensitivities?
- What impact would delay response times from emergency medical responders have on the students and staff of the school district?

6.4.3 San Juan County

6.4.3.1 Town of Friday Harbor

The Town of Friday Harbor's letter emphasizes its economic dependence upon the health and stewardship of the natural environment to remain sustainable, and the use of private and public modes of transportation in the surrounding waters by residents and visitors alike. The letter requests that the risk to the community be measured not only based on the probability of a spill event but also based on the potentially irreversible impacts on wildlife and the ability of the islands to regain the pristine environmental conditions upon which so many depend for their livelihood. Several specific questions are listed in the letter.

6.4.3.2 San Juan Board of Health

The San Juan Board of Health's letter is addressed to the Robert Wood Johnson Foundation and the Pew Charitable Trusts. It expresses the strong support of the San Juan County Board of Health for a health impact assessment that would evaluate the possible human health and environmental consequences of the proposal and asks that they fund the analysis. The San Juan Board of Health emphasizes that the assessment must be performed independently and objectively to the best standards.

6.4.3.3 San Juan County Council

The San Juan County Council submitted three scoping letters. The first comment letter attached the letters from the following:

- San Juan County Board of Health (requesting an independent Health Impact Assessment). This letter is summarized above in Section 6.4.3.2
- San Juan County Marine Resources Committee (which includes an oiling residence time map for San Juan County, based on data from the Washington Department of Natural Resources ShoreZone Mapping (2001)).

The San Juan County Marine Resources Committee letter requests that all potential impacts from the proposed increased shipping traffic and transport of coal through the marine waters surrounding San Juan county be analyzed and evaluated, including impacts on water quality, air quality, critical habitat, aquatic resources, and endangered species, as well as public health and impacts on the environment and tourism-based economy, including recreational and commercial boating, wildlife viewing, and fisheries. The letter includes a list of specific questions regarding vessel traffic, marine life, climate change, and risk of collision.

The second letter from San Juan County Council references the legislative priority from San Juan County Resolution No. 36-2012 and attaches Executive Order 12-07, Washington's Response to Ocean

Acidification. The letter specifically requests that the EIS address ocean acidification's risk to San Juan County's marine species and ecosystems. The letter also expresses concern about the increased risk of a coal spill given the December 7 bulk carrier crash into a berth at the Westshore (British Columbia) Terminals. The letter also requests that the EIS address the increased risk of an oil spill as a result of increased vessel traffic associated with the proposal, according to the George Washington University updated Vessel Traffic Risk Assessment.

The third letter expressed concerns for ocean acidification risks to San Juan County's marine species and ecosystems and questions what the impacts would be based on the tonnage of coal proposed to be exported and subsequently burned. It further expresses concerns about the increased risk of a coal spill.

6.4.4 Skagit County

6.4.4.1 City of Burlington

The City of Burlington's letter expresses two overarching concerns and includes an attachment with several detailed concerns in the form of substantive comments. The two overarching concerns are 1) the appropriateness to prepare a comprehensive, programmatic EIS to examine the proposal along with other proposed terminals and 2) the appropriateness for an analysis of the proximal impacts, including those associated with transporting coal to the terminal site and impacts along the BNSF mainline to prevent a patchwork of local regulation from unreasonably interfering with interstate commerce, while still meeting the requirement of the Coastal Zone Management Act (CZMA). The substantive comments that are attached to the letter describe specific concerns and requests specific analyses for the following:

- Traffic and parking/transit and pedestrians
- Public (primarily emergency) services
- Skagit river bridge
- Economic impacts
- Socioeconomic conditions and environmental justice

The attachment further describes the issues as they relate to the city of Burlington. It suggests areas of analysis and mitigation strategies to address these impacts.

6.4.4.2 Mayor Ramon Hayes, Town of La Conner

Mayor Ramon Hayes spoke at the Mount Vernon scoping meeting about the need for more information on the proposals, including whether trains would come through regardless of whether or not the proposals are built, mitigation available for potential traffic issues, especially along the I-5 corridor, and the funding for mitigation coming from the proposal applicants.

6.4.4.3 City of Mount Vernon

The City of Mount Vernon letter expresses concern that the additional rail traffic from the proposal would result in safety and mobility impacts on the city's most-traveled transportation corridors, and that these impacts would impede business development and investment at a time when the city is removing such obstacles in order to promote economic development. The city requests that there be full consideration of alternatives, as well as mitigation measures, designed to alleviate the conflicts between rail traffic and the city's system of roadways. The letter also lists specific areas of analysis in support of a scope that includes a review of related connected actions and cumulative actions.

6.4.4.4 City of Sedro Woolley

The City of Sedro Woolley letter describes concerns related to the potential for delays at at-grade crossings, inhibiting the travel of emergency vehicles traffic delays and congestion. It also describes the current condition of the BNSF Skagit River Bridge and the potential for additional freight traffic to exacerbate the risks of another failure during high water events. It specifically asks that the replacement of the bridge be included in the scope of the EIS. The letter also asks that as part of the EIS analysis, consideration of alternatives as well as mitigation measures be evaluated to alleviate the conflicts between rail traffic and the city's system of roadways.

6.4.4.5 Mount Vernon Schools

The Mount Vernon Schools letter asks that the EIS investigate and study the impacts of increased train traffic on the transportation of Mount Vernon School District students to and from the nine school sites and address specific solutions.

6.4.4.6 Port of Skagit

The Port of Skagit letter expresses concerns related to the community's economic activity, which is dependent on the ready east-west traffic movement of cars and trucks. It explains that rail crossings currently block local business traffic at eight at-grade crossings. The Port of Skagit's support for the proposal is dependent upon the careful study of issues and solutions, with the required funds to solve the problem being incorporated into the budget of the proposal.

6.4.4.7 Skagit Regional Health

The Skagit Regional Health letter requests that the EIS investigate and study the impacts caused by the proposal on the level of service to and from Skagit Valley Hospital in Mount Vernon and to and from their multiple clinic sites in Skagit and Snohomish counties. Delays caused by having to reroute around crossings that are closed due to extended train traffic would increase the time it takes to access the hospital and clinics.

6.4.4.8 Skagit County Board of Commissioners

The Skagit County Board of Commissioners letter expresses concerns about the potential impact within Skagit county arising from additional coal trains that would pass through Skagit County's urban core, bisecting the cities of Mount Vernon and Burlington. Specific issues include the following:

- Degradation of transportation levels of service
- Impacts on the community's transportation grid
- Impacts on passenger rail service
- Impacts on the outdated BNSF bridge over the Skagit River

6.4.5 Snohomish County

6.4.5.1 City of Edmonds

The City of Edmonds letter requests the scope of the EIS include a detailed study of the baseline interference to traffic patterns between trains and vehicle traffic, including but not limited to projected coal train traffic. The study should identify possible alternatives to resolving these conflicts, which can be analyzed as possible mitigation for this proposal. The letter also requests that the EIS study interferences with ferry system operations and make reliable projections based on expected conditions out to 2030. The letter also asks that a comprehensive study be conducted in Edmonds that measures the sound level and impacts of train whistles on hearing loss, sleep patterns, real estate prices, and stress levels.

6.4.5.2 City of Everett

The City of Everett letter asks that the EIS include additional details about the number of additional train trips above current levels, the routing of additional train trips and the track and related infrastructure improvements necessary to support the additional train traffic. It also asks that the EIS identify in the description of the no action alternative the routes that coal trains would use and the anticipated future train traffic volumes to transport coal to other potential export facilities. Other issues requested for analysis are detailed under the following areas:

- Air quality impacts
- Traffic impacts on at-grade rail crossings
- Landslide activity
- Structural issues
- Freight mobility
- Passenger trains
- Water quality (including Port Gardner Bay/Possession Sound, Snohomish River)
- Navigation on the Snohomish river waterway

The City of Everett also asked for citizen comments on the scope of the EIS; these comments are also attached to the letter.

6.4.5.3 City of Marysville

The City of Marysville letter requests that the EIS fully disclose and carefully assess the impacts of the proposal on Marysville, other communities and the broader region. The letter asks for an analysis of the following:

- Public investment and transportation – Analyze the public cost to develop capital projects that would separate at-grade crossings.
- Public safety – Analyze increased train traffic and the potential to increase accidents, impacts on the city’s level of service and decreased ability to provide effective emergency response times.
- Economic – Analyze increased train traffic and port activity and the potential to compromise existing businesses and damage property.
- Public health – Analyze coal dust and diesel emissions on public health, and analyze public safety, including the potential for train traffic to lead to more frequent accidents, such as train derailments, and delays in emergency response times.
- Climate change.
- Cumulative Impacts – Assess the cumulative impacts of the five ports.
- Alternatives – Including export of other commodities, the use of the property by other industries and a no action alternative.

The letter includes details for each of these issues.

6.4.5.4 City of Mukilteo

The City of Mukilteo letter requests that the environmental review consider in its scope the regional impacts of the proposal beyond Whatcom County, including direct, indirect, and cumulative impacts on the city of Mukilteo. As part of the analysis, the city requests full consideration of alternatives as well as mitigation measures designed to alleviate the air quality, noise, and vibration impacts, as well as slope stability impacts and waterfront access impacts, as well as whether the proposal’s financial mitigation is appropriate.

6.4.5.5 City of Stanwood

The City of Stanwood letter requests that the environmental review consider the regional impacts of the proposal beyond Whatcom County, including direct, indirect, and cumulative impacts on the city of Stanwood. As part of the analysis, the City believes full consideration of alternatives as well as mitigation measures to address Stanwood’s identified concerns are in order. The letter references a memorandum by Edward Koltonowski of Gibson Traffic Consultants, Inc., dated August 8, 2011, and requests that the issues identified in this letter be incorporated into the scope and that further information analysis,

mitigation and alternatives be developed for each issue. The city requests analysis of increased rail traffic and the impacts on air quality, and it provides a specific list of these issues. The city also requests that railroad representatives meet with local citizen groups and local government offices to seek mutually acceptable ways to address local concerns.

6.4.5.6 Town of Woodway

The Town of Woodway letter echoes the issues identified in the letter submitted by Snohomish County Tomorrow (see Section 6.4.5.6). In addition the, city is concerned about the impacts the increased rail traffic would have on the high bank bluffs (critical areas as defined by Ecology) adjacent to the rail line. The city requests that the EIS study the increase in train traffic and the length of the trains, which could create increased instability to these lands, which are already well-documented as unstable.

6.4.5.7 Snohomish County Tomorrow

The Snohomish County Tomorrow letter requests that the EIS examine the impacts of coal trains and the coal export industry on the citizens, local environment and quality of life ,which includes the direct, indirect, and cumulative impacts of coal export. The letter asks for an analysis of the following:

- Public investment and transportation – Analyze the public cost to develop capital projects that would separate at-grade crossings. A specific reference is made to a preliminary traffic analysis that has been done for Edmonds, Marysville, and Stanwood.
- Public health – Analyze coal dust and diesel emissions on public health, and analyze public safety including the potential for train traffic to lead to more frequent accidents, including train derailments and delays in emergency response times.
- Public safety – Analyze increased train traffic and the potential to harm communities by leading to more frequent accidents, including train derailments, and delays in emergency response times.
- Economic – Analyze increased train traffic and port activity and the potential to slow growth of existing businesses and damage property.
- Marine Health – analyze risks including oils spills, impacts during construction (turbidity, noise, and lighting), impacts during operations (outfall pipes, night lighting, noise from vessels, and other operations), coal dust
- Climate change.
- Alternatives – Including export of other commodities, the use of the property by other industries and a no action alternative.

The letter includes details for each of these issues.

6.4.5.8 Adrienne Fraley Monillas, Edmonds City Council

At the Seattle meeting, Ms. Fraley Monillas voiced concerns for public safety, especially for the senior center in Edmonds, and people that need to access ferry. She also expressed concern for issues regarding health and the impacts from coal dust on the citizens of Edmonds, as well as the wildlife in Puget Sound and Edmonds.

6.4.6 King County

6.4.6.1 City of Bellevue

The City of Bellevue letter concurs with other local commenters that the EIS should account for the direct and indirect impacts resulting from construction and operation of the proposal on sensitive aquatic and wetland habitats in the vicinity of the proposals. It also asks study of the indirect and cumulative environmental human impacts, including coal dust emissions and associated mercury and heavy metal pollutants on water quality, habitat, and listed species throughout the route, and the impacts on transportation (notably the NE 8th Street at-grade crossing, which provides the main connection into and out of downtown Bellevue and the Hospital District), public safety, quality of life, human health, and property values associated with the transport of coal through heavily populated urban corridors. It also encourages coordination with the transportation, planning, and economic development agencies in the Bellevue area, as well as cities and counties along the rail corridor to thoroughly document baseline conditions and future plans for freight and passenger rail capacity along these rail corridors.

6.4.6.2 City of Kent

The City of Kent letter expresses concern about the economic and environmental impacts from the increased train activity through the heart of the City. It requests that impacts on local traffic congestion and the level of service on the local road network be examined and that the mobility and safety impacts, including crossing delays for fire, police, emergency transport vehicles, school buses, and workers be evaluated. It also asks that the EIS look at how the proposal would affect competition for future rail capacity and opportunities for other uses of track time. Other requests for analysis include the following:

- The impact on public health from noise, diesel emissions, and coal dust.
- Impacts from noise and vibration, including a potential Quiet Zone in Kent's downtown area.
- The effect of vibration on hillsides.
- The effect of coal dust on environmentally sensitive wetlands, floodplains, and streams, including the Green River and Mill Creek.

6.4.6.3 City of Monroe

The City of Monroe letter requests an analysis of the cumulative impacts of all currently proposed coal export facilities and/or dry bulk commodity terminals within Washington and Oregon in an analysis pursuant to NEPA; an analysis of the impacts on the health and welfare of the citizens of Monroe, including impacts from diesel emissions from trains, noise, and the potential for increased rail/car and rail/pedestrian accidents through a comprehensive independent third-party health impact assessment; and an analysis of the impacts on existing freight train and passenger train service, including impacts on shared capacity by the addition of up to nine additional bulk-commodity train trips per day on BNSF railroad infrastructure through the City of Monroe.

6.4.6.4 City of Shoreline

The City of Shoreline letter states that a comprehensive programmatic EIS should include the mining, transportation, terminals, unloading/loading, shipping to Asia, burning with its impacts on climate change, ocean acidification, and air pollution. It also expresses concerns for the Puget Sound and the Cherry Point Aquatic Reserve, including the herring populations and the endangered salmon and orca, and the effects on food production, existing jobs in the fishing tourism industries and cultural impacts on traditional Lummi Tribal grounds. Other concerns identified in the letter include water pollution impacts on the Puget Sound from derailment, traffic impacts related to railroad crossings, a request for a cost-benefit analysis that quantifies jobs destroyed versus jobs created, an analysis of economic impacts on human health care, environmental remediation, and impacts on property values and city tax revenue. The letter also asks questions about a no action alternative and what that alternative might be, and it suggests that alternative uses of the site should be analyzed. The letter includes an enclosure with additional written public comments.

6.4.6.5 Mayor Mike McGinn, City of Seattle

Mayor McGinn spoke at the Seattle scoping meeting and voiced questions regarding the proposal's effect on commuters, freight traffic, and public safety, especially emergency responders who must go from one side of the tracks to the other. He also stated concerns about the city's transit system and the health issues that surround coal dust in the communities that are next to it. Other concerns and effects he mentioned related to water quality, habitat, and global warming.

6.4.6.6 Seattle Parks and Recreation

The Seattle Parks and Recreation letter expresses concern for a number of park and open space assets that are in close proximity to the rail lines. The letter includes a map noting the park assets that may be affected. The letter also requests that the EIS address cumulative risks, proximate and long-term property risks and public health risks. It asks that the cumulative analysis include consideration for existing coal trains, as well as the expected induced coal train traffic. The concerns about proximate risks include impacts on air, water, soil and noise

pollution, potential increases in train-related accidents, park access, train derailments, and impacts on property values. Long-term property risks and concerns relate to the burning of coal and how it affects long-term health impacts. The letter also asks how far coal dust is expected to spread from the rail corridors and how this dust would affect human health.

6.4.6.7 County Executive Dow Constantine, King County

King County Executive Dow Constantine's letter expresses concerns about the proposal's potential significant adverse environmental impacts on air and water quality, energy, and natural resources, environmental health, land and shoreline use, public services, transportation in communities along the rail corridor, and the broader implications for increased climate pollution. The letter requests inclusion in the EIS of the following areas of analysis:

- Health, equity, and social justice impacts
- Environmental impacts.
- Freight and passenger rail system impacts.
- Truck freight, transit, passenger vehicle, and ferry traffic impacts.

6.4.6.8 Councilmember Larry Phillips District Four, Metropolitan King County Council

Councilmember Larry Phillips' scoping letter expresses the following concerns and requests that the analyses in the EIS consider:

- Impacts on public health from air and water pollution from diesel engines and coal dust emanating from open rail cars.
- Impacts on quality of life from noise pollution.
- Impacts on traffic and safety.
- Effects on residential and commercial development along the rail line due to increased noise, pollution, and traffic impacts from coal trains, decreased property values in communities, and hampered investments in new housing and retail.
- Congestion on the tracks that could impede current and future freight, passenger, and commuter rail service.
- Economic costs associated with the rail system, road, and infrastructure upgrades that would be required by the proposal.
- An economic analysis to determine whether the proposal would result in a net gain or loss of jobs, and a net gain or loss to the economy.
- Accelerated climate change resulting from burning coal for fuel.
- Negative impacts on the shoreline environment at Cherry Point.

6.4.7 Pierce County

6.4.7.1 City of Puyallup

The City of Puyallup letter expresses concerns about potential impacts as a result of the coal train traffic and recommends that the Co-Lead Agencies consider the October 2012 Coal Train Impact Study prepared for the City of Seattle. The letter includes a list of concerns including traffic delays and congestion, air quality degradation, contamination of soil or property, noise pollution, rail congestion and impacts on the Port of Tacoma and other passenger rail services, property values, and hazardous material spills. The letter provides a list of mitigation measures and requests that the Corps prepare a separate comprehensive environmental review that addresses the cumulative effects of all activities associated with proposed coal shipments to the five identified terminals in Oregon and Washington.

6.4.7.2 City of Sumner

The City of Sumner letter requests that the cumulative impacts of all proposed coal export facilities and/or dry bulk commodity terminals within Washington and Oregon be studied in a cumulative impact analysis pursuant to NEPA. It also requests that the EIS include an analysis of health impacts of additional train traffic in the City of Sumner as well as elsewhere along likely rail corridors associated with the proposals; an analysis of social impacts to include detailed and realistic assessment of the impact on quality of life, developability, and economic attractiveness in areas along the likely rail corridor; an analysis of the economic impacts should consider and quantify the likely trade-offs associated with jobs generated at the GPT versus jobs that may be lost along the corridor; and an analysis of the cost of each specific necessary impact mitigation measure.

6.4.7.3 Ryan Mello, Tacoma City Council

At the Seattle meeting, Mr. Mello verbalized concerns about additional train traffic and the impact that traffic could have on existing Port container traffic at Tacoma ports; impacts at the at-grade crossings, particularly for pedestrian traffic and vehicle traffic; the proposal's inconsistencies with the state's climate action plan; impacts on property values; and future passenger rail impacts.

6.4.8 Thurston County

6.4.8.1 City of Olympia

The City of Olympia letter requests that the EIS examine the direct, indirect, and cumulative impacts of coal export on public health, traffic, existing businesses, public infrastructure, water quality, air quality, agriculture, climate change, and quality of life. It asks that the EIS take a hard look at the public health impacts from coal dust and emissions related to rail and vehicle traffic, climate change, and the associated impacts on quality of life, public health, and the environment,

economic impacts from increased train traffic and the potential to slow growth of the existing businesses and damage property and cumulative impacts of the proposal, as well as projected increases in rail traffic from other coal export proposals. The letter also urges the Co-Lead Agencies to complete a robust analysis of alternatives to coal export at Cherry Point, including export of other commodities, the use of the property by other industries and a no action alternative.

6.4.8.2 Thurston County Board of County Commissioners

The Thurston County Board of County Commissioners expresses concerns about the proposal's impact on public safety, public health, the environment, and the economy. It requests that the EIS specifically analyze the potential health risks to Thurston County's population, especially the very young, elderly, and pregnant. It requests that the EIS study all railroad crossings in Thurston County for safety, assess the negative impacts on quality of life, public health, and the environment associated with climate change, and analyze economic impacts, including an approximate net gain or loss to the economy. The letter also attaches Resolution Opposing Coal Export, passed on August 7, 2012.

6.4.8.3 City of Vancouver

The City of Vancouver letter requests that the EIS include an analysis of impacts from coal dust on human health or natural wetlands, soil, vegetation, and streams; blocked crossings and the impact on residential and commercial traffic congestion, lost productivity, increased tailpipe emissions, etc.; delays to emergency responders; impacts from chemical surfactants sprayed on the coal; train horn noise; increase in train diesel emissions; and the cumulative impacts from other coal export facilities.

6.4.9 Clark County

6.4.9.1 Clark County

The Clark County letter expresses concern about how rail traffic could harm the quality of life in Clark County, especially those living and owning businesses near the rail lines. Impacts of concern include: emergency response delays; increased traffic congestion; air and noise pollution due to idling trains, air pollution created by coal dust, blocked pedestrian and bicycle access to the waterfront, destabilizing steep slopes adjacent to the tracks, and changes to established and developing quiet zones. It also asks that a thorough consideration of alternatives and mitigation measure be included in the analysis.

6.4.9.2 Mayor Sean Guard, City of Washougal

The City of Washougal letter requests that the EIS address the significant unavoidable adverse impacts on the City of Washougal, and other communities that these trains would travel through, including but not limited to impacts from 1) vehicle emissions from idling vehicles at

blocked at-grade crossings; 2) emergency response delays at blocked at-grade crossings; and 3) the impact of coal dust on the community and environment. The EIS should address ways to avoid, minimize, and mitigate the effects of these impacts on our community.

6.4.9.3 Councilmember Paul Greenlee, City of Washougal

Washougal Councilmember Paul Greenlee's scoping letter requests that the EIS examine the impacts of coal trains and the coal export industry on Washougal's citizens, local environment, and quality of life. This includes the direct, indirect, and cumulative impacts of coal export on public health, traffic, existing businesses, public infrastructure, water quality, air quality, agriculture, climate change, and quality of life. The letter includes specific concerns with regard to Washougal's at-grade crossings and the potential economic and public safety impacts at those crossings.

6.4.9.4 Vice Chair Steve Stewart, Clark County Board of Commissioners

Mr. Stewart voiced concerns at the Vancouver meeting regarding the added rail track and potential harm on the quality of life in Clark County, especially those living and owning businesses along the rail lines. He also expressed concerns for impacts from increased emergency response times, increased traffic congestion, air, and noise pollution due to idling trains, air pollution created by coal dust, blocked pedestrian bicycle access to the waterfront, destabilization of steep slopes adjacent to the tracks, and changes to established quiet zones.

6.4.10 Skamania County

6.4.10.1 City of North Bonneville

The City of North Bonneville submitted City Council Resolution #453 for formal comments for scoping. The resolution requests that the scope of the EIS be comprehensive and analyze all potential human and natural environmental effects caused or generated by the construction of coal export terminals, including all other proposed facilities on the West Coast. It states that in order to be comprehensive it must include an analysis related to the mining, transportation, and handling of coal. Issues to be studied should include noise, air quality, human health, traffic, and safety, wildlife and wildlife habitat, marine species, fish and fisheries, wetlands or streams, and water quality. The resolution provides details for each issue. The resolution also specifically requests that the area of potential effects begin at the mining of the coal, transportation and export, and end with the resulting consumption through burning of American coal by Asian power producers. It also requests that sufficient time be given to elected officials to thoroughly review the analyses prior to preparing official written comments to a draft EIS.

6.4.11 Spokane County

6.4.11.1 City of Cheney

The City of Cheney letter requests that the scope of the EIS include an analysis of potential impacts from delays at rail crossings, increased response times for emergency services, traffic congestion, and emissions from waiting vehicles. Other impacts that should be considered include increased emissions from diesel locomotives, train noise (including both rail noise and train horns), and the potential consequences of a derailment or train/vehicle collision in the city. The letter also requests that a cumulative impact analysis be prepared to include additional rail transport effects in Cheney resulting from other reasonably foreseeable future rail terminal projects, including impacts from the proposed Morrow Pacific Coal Export Terminal Project and the Ambre Millennium Bulk Terminals.

6.4.11.2 Cheney Public Schools

The Cheney Public Schools letter requests that the scope of the EIS include the school district as well as the city of Cheney and the West Plains area. It requests that the EIS examine the impact on children's health that could be caused by air pollution, as well as the additional cost to the school district if a large number of trains result in regular delays for buses traveling to pick up students on rural routes in the district.

6.4.11.3 City Council President Ben Stuckart, City of Spokane

At the Spokane meeting, Mr. Stuckart voiced a request that the EIS evaluate the potential impact on Spokane's public health, safety, economy, transportation systems, and air quality. He also expressed that the EIS should be cumulative and should disclose the number of trains that traveled through Spokane in the past as well as the number of trains that are expected to travel through Spokane in the future as a result of the five proposed terminals in the northwest.

6.4.11.4 Councilmember Jon Snyder, Spokane City Council

Mr. Snyder spoke at the Spokane meeting and requested that the EIS evaluate the effects of coal trains on commercial traffic in cities like Spokane, Spokane valley, Millwood, and Cheney. He asked questions about the number of trains that would come through the area, potential train derailments, and concerns about the health impacts, emergency crossing delays, and delivery of service, as well as impacts on the city's local transportation planning efforts.

6.4.12 Hood River County, Ore.

6.4.12.1 Councilmember Kate McBride, City of Hood River, Ore.

At the Vancouver meeting, Ms. McBride voiced that her community opposes both train and barge transport of coal due to the impacts on the quality of life and tourism in the Hood River area. She expressed concerns about impacts from coal dust, noise, and potential safety and fire hazards, and coal dust entering the water as a health hazard.

6.4.13 Bonner County, Idaho

6.4.13.1 Councilmember Aaron Qualls, City of Sandpoint, Idaho

Mr. Qualls verbalized concerns at the Spokane meeting related to Sandpoint, Idaho, which is a major chokepoint along the rail route. He asked questions about the number of trains that would pass through town, the potential impacts on traffic emergency vehicle response times and safety risks at crossings. Other concerns he expressed were related to air quality, water quality, train derailments, and the costs to Lake Pend Oreille and the communities along the rail route.

6.4.14 Park County, Mont.

6.4.14.1 City of Livingston, Mont.

The City of Livingston requests that the scope of the EIS include an analysis of effects to the City of Livingston, Mont. The letter identifies the following issues:

- Reduced access; as the city is bisected by the rail line.
- Additional noise from train traffic.
- Potential health hazards from exhaust and coal dust

6.4.14.2 Livingston City Commission

The Livingston City Commission letter expresses concerns about the possible impacts on health from an increase in idling cars and trucks waiting at rail crossings and from the movement of coal dust in areas surrounding the tracks and the health impacts that could occur if inhaled.

6.4.15 Gallatin County, Mont.

6.4.15.1 Gallatin City-County Health Department

The Gallatin City-County Health Department letter asks that the EIS examine the entire transport corridors from the mines to the ports. It requests a comprehensive, cumulative, and connected analysis, including an analysis of air quality impacts from coal dust and other proximate air pollutants, blockage of access, and potential delays of emergency vehicles, impacts on quality of life and noise pollution.



7. Summary of comments from other groups

7.1 Organized interest groups

Many organized interest groups, representing a wide spectrum of issues, submitted comments letters. Their interests include businesses and labor, neighborhoods, human health, human rights, religions institutions, clean energy, sustainability, and environmental protection and conservation. The concerns expressed in each of these letters have been summarized as part of Section 5.0, Public comments summarized by resource issue. In addition, brief summaries of the groups that commented and the issues raised in their comment letters are provided below, along with Table 7-1, which summarizes all comments.

- Business groups and labor entity concerns were focused primarily on economic effects of job creation as well as impacts on freight mobility and local access to business districts.
- Neighborhoods and health and human rights advocates were concerned about quality of life issues including the health impacts from coal train noise and vibrations, congestion, and delays to emergency services and crossings, and health impacts from coal dust and diesel emissions. Several requests were made for a health impact assessment.
- The League of Women Voters provided a range of issues, including requests to include a cumulative effects analysis, health impacts, cost-benefit analysis, environmental, Tribal and cultural impacts, hazards and cleanup from potential spills, congestion, and emergency delays at crossings.
- Many groups affiliated with clean energy, environmental protection, conservation, and sustainability issues submitted comment letters. These letters provide detailed requests for analysis on a broad range of issues concerning the natural environment and habitats, as well as health and community impacts.

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
AFL-CIO, Puget Sound Ports Council, Maritime Trades Department, Vince O'Halloran – President	Washington	Request for site-specific EIS; consider local economic benefits from increased tax revenues, wages, economic security, and economic diversification; review mitigation effectiveness of proposed fence and tree buffer at terminal site; review safety and security of public waterways including risk of collisions or grounding
Alaska Coalition of Washington	Alaska	Environmental, ecological, climate change, and health impacts from coal consumption in Alaska; lack of public hearings in Alaska
Alliance for Northwest Jobs	Pacific Northwest	Request for project site-specific EIS; impacts on employment rate from construction and trade jobs
American Federation of Labor and Congress of Industrial Organizations (AFL-CIO), Michael Sacco	National	Request for site-specific EIS; analyze direct loss of construction and operation jobs, loss of employment and income in Whatcom County, loss of local and state business-related tax revenue, loss of property tax revenue from GPT site improvements, long-term effects of lost opportunity to expand public services
American Fisheries Society, Western Washington University, Student Chapter	Washington	Fishery resources and aquatic ecosystems impacts from artificial night lighting, underwater noise, vessel traffic, and coal dust/cargo spillage; nearshore habitat impacts; economic impacts on local fisheries
Arlene French, board member, Evergreen Island	Washington	Impacts on marine mammals and food sources from increase in marine shipping traffic, including increased collision risk with container vessels and increased noise
Asian Counseling and Referral Services and International Community Health Services	Washington	Include Health and environmental justice impact assessment for Chinatown International District vulnerable elderly and youth populations, and other patients of International Community Health Services Clinic seeking health care; direct and indirect impacts from increased coal train traffic on air quality and housing conditions
Association of Washington Business	Washington	Request for project site-specific EIS; economic impacts through job creation, increased economic activity; competition with Canada for coal exports at facilities with less stringent environmental standards than Washington
Bellingham Bay Athletic Organization Board	Washington	Noise, air quality, human health impacts from coal train traffic; safety and economic impacts on Bellingham Bay marathon events that cross train tracks
Bellingham Whatcom Chamber of Commerce	Washington	Explore air quality and maintenance cost impacts of shipping goods via rail versus truck; examine historic freight rail traffic totals; consider mitigation for increased train traffic in Whatcom County, such as grade separation
Bellingham/Whatcom Chamber of Commerce and Industry	Washington	Request for project site-specific EIS to review important GPT-specific impacts; local economic impacts from tax revenues, potential for new jobs and impacts of key Whatcom County industries (such as tourism); review recent train traffic to capture fluctuation levels; compare environmental impacts of train vs. truck freight; review current, and proposed Canadian terminals to determine export capacity
Building Industry Association of Whatcom County	Washington	Request for project-specific EIS; review impacts on local economy from job growth and increased tax revenues

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
Cascadia Wildlands	Oregon	Request for Programmatic EIS to analyze cumulative environmental, health, and endangered species impacts from coal extraction, shipping, and consumption, including all Pacific Northwest coal export projects
Center for Justice	Washington	Issues with submitting online comments and verbal testimony at scoping meetings; request for public Draft EIS Hearing in Spokane; EIS should analyze impacts on local (Spokane) rail capacity, impacts from coal dust, and effectiveness of dust mitigation measures; request for extension of public scoping comment period
Center for Salish Community Strategies	Washington	Establish baseline on site geomorphology, environmental track record of other coal export terminals, BNSF rail capacity and number of existing trains; review impacts considering maximum possible length and number of trains, maximum possible export volume of GPT and estimated jobs increase from project application; consider environmental (water quality), climate change, Tribal, tourism, recreation, congestion, and fiscal impacts from GPT and along entire rail corridor, including financial responsibility for mitigation; request economic analysis looking at adverse impacts on number and growth potential for existing jobs in areas along rail corridor; impacts from accident/spill risk
Chinatown-International District Business Improvement Area	Seattle	Include Health and environmental justice impact statement for Chinatown-International District area, traffic study to determine impacts of delays from coal trains; impact assessment on neighborhood historic structures from train vibrations
Chinese Expulsion Remembrance Project, Densho, Honoring Filipino Americans in Chinatown-International District Project, Organization of Chinese Americans Seattle Chapter, Interim Community Development Association	Washington	Include and implement Section 106 historic buildings and neighborhoods impact assessment to study indirect impacts on historic buildings in Chinatown International District due to acid rain caused by coal train traffic and associated pollution
Church Council of Greater Seattle	Washington	Environmental, health, and ecological impacts from coal dust and greenhouse gas emissions
Citizens for a Clean Harbor (Grays Harbor), Carol Seaman	Washington	Environmental and human health impacts of coal trains to natural/scenic resources and nearby communities
Citizens for Sensible Transportation Planning	Washington	Identify traffic congestion, economy, and emergency services impacts, and mitigation from additional coal trains at grade crossings; clarify maximum number of daily trains necessary to move projected coal volume at maximum build-out; human health impacts from diesel particulate matter emissions
Cliffside Community Club Board of Trustees, Teresa Anderson	Washington	Community, structural, and health impacts from coal train noise and vibrations; congestion and delays to emergency services at crossings; effect on local economy from direct and indirect train impacts; environmental and health impacts from coal dust and diesel particulate matter emissions

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
Coastal Conservation Association – North Sound Chapter	Washington	Impacts on marine life, marine life habitat and recreational fishing
Columbia Neighborhood Association – Bellingham	Washington	Community impacts of increased rail traffic on noise, traffic and quality of life; marine environmental impacts from the proposals and increased shipping traffic; climate change impacts of coal consumption
Columbia Riverkeeper	Oregon	Request for Programmatic EIS and health impact assessment for northwest coal export projects to study impacts on Columbia River communities, habitat and endangered species
Community Coalition for Environmental Justice, GotGreen, Wilderness Inner-city Leadership Development Program	Washington	Include environmental justice assessment and health impact assessment on Seattle Chinatown International District neighborhood where vulnerable populations live, work and visit; air quality, health and economic impacts from increased coal train traffic
Communitywise Bellingham	Washington	<ul style="list-style-type: none"> • Coal storage and transport: impacts of fugitive dust and toxic leachates on environment and natural resources • Request for objective assessment of baseline railroad and coal shipping traffic conditions • Review unresolved railroad capacity issue on Bow to Ferndale segment of BNSF network: may require additional siding improvements along waterfront • Request for Programmatic EIS to review impacts from increase of coal exports on freight rail system capacity and associated congestion, potential economic and recreation impact from siding construction in Bellingham • Evaluate human health impacts from diesel particulate matter emissions, including mortality rate and various disease incidences; require Tier 4 locomotives to service GPT to reduce emissions • Review coal train impacts along entire rail corridor, include active siding along Bellingham waterfront in project permit, delegate responsibility of train-related mitigation costs to proposal applicants • Examine range of alternatives for increasing Whatcom County rail capacity; analyze impacts of new rail siding through Bellingham; identify community, health and economic impacts from siding; identify mitigation: measures, costs and financial responsibility • Request to include comprehensive cost-benefit analysis for community, economic, industry and Tribal impacts in Whatcom County; broader cost-benefit analysis for communities affected by train and vessel traffic along entire corridor
Conservation Northwest	Washington	Impacts on Salish Sea: shorelines, marine and bird species, fish and fisheries, tourism and local economy ; scoping should include potential cumulative impacts resulting from buildout of GPT and other coal export facilities when considering existing and ongoing impacts such as pollution

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
Construction and General Laborers' Union Local 276	Washington	Request for project-specific EIS; examine job growth, increased local tax revenue and other economic benefits to Whatcom County
Cully Association of Neighbors (Portland, Ore.)	Oregon	Request cumulative, area-wide programmatic EIS to study environmental, climate, ecological, noise, economic, traffic, health, recreation and quality of life impacts from shipping coal in Columbia River Gorge, either by rail or barge
Deacon St. Hilda St. Patrick Episcopal Church	Washington	Impacts on global greenhouse gas emissions, local economy and Tribes
Earth Justice and Climate Solutions	National	Request for area-wide (programmatic) EIS to address direct, indirect and cumulative impacts of all proposed Pacific Northwest coal projects; GPT analysis should include coal extraction, shipping, consumption impacts
Edgemoor Neighborhood Association	Washington	Community, structural, economic and health impacts from train noise and vibration, new active rail siding, increased train traffic, use of Bellingham Bay as potential overflow anchorage for GPT
Everett Shorelines Coalition	Washington	Include cost projections for facility operating and business expenses, ongoing monitoring and protection of GPT's natural environment and mitigation and remediation methods; consider adaptive reuse of terminal site if GPT loses economic viability; impacts on aquatic and terrestrial habitat from bulk commodity transport and accidents/spills, vulnerability of shore storage area, spur track(s) and adjacent wetlands to potential lurch of Juan de Fuca Plate; and GPT site exposure to seaborne invasive species from docked vessels
Evergreen Islands	Washington	Request for regional programmatic EIS to study economic, environmental, transportation and infrastructure impacts across broad geographic area and numerous ecosystems; study mitigation of coal rail shipments to GPT and other proposed Pacific Northwest terminals; include cumulative impacts: building Tethys Bottling Plant in Anacortes and associated water train shipments, Bakken Oil trains from North Dakota to local refineries
Evergreen Land Trust	Washington	Direct, indirect and cumulative impacts of economic, social, health and environmental costs, including impacts on global climate change; include and evaluate alternative economic development opportunities
Friends of Alaska National Wildlife Refuges and FRIENDS of the San Juans	Alaska	Study proposal impacts on environment, natural habitats, local economy in Alaska National Wildlife Refuge and on global climate
Friends of Chuckanut, Laura Leigh Brakke	Washington	Impacts on critical areas (Chuckanut Bay and Mountains) from coal train traffic; request for Programmatic EIS to examine community, human and habitat health and environmental impacts along entire coal transportation corridor, including extraction and consumption; impacts on emergency services from blocked crossings; consider required mitigation such as overpasses financed by Applicant
Friends of Grays Harbor	Washington	Fossil fuel impacts on natural environment, marine resource industries and human health along Pacific Coast; cumulative impacts on the Port of Grays Harbor

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
Friends of the Columbia Gorge	Oregon	Environmental, health, community and economic impacts of coal transportation and increased rail traffic on Columbia River Gorge and natural resources, including coal dust, risk of spills and increased rail traffic
Friends of the Earth	National	Request area-wide EIS assessing cumulative impact of all existing and proposed Pacific Northwest coal export terminals and Kinder Morgan pipeline to marine habitats and environment from vessel traffic, and potential oil/coal spills; impacts of coal consumption on climate change
Friends of the Ridgefield National Wildlife Refuge	Washington	Environmental, ecological, noise, quality of life and health impacts in Southwest Washington from coal trains and dust; wildlife refuge access impacts from trains at grade crossings
FRIENDS of the San Juans	Washington	Cumulative analysis of environmental, ecosystem, Tribal tourism and local economy impacts of the proposals from climate change effects, reduced air & water quality, risk of accidents/spills and noise when impacts are combined
Futurewise	Washington	Request Programmatic EIS to assess individual and cumulative impacts of all proposed Pacific Northwest coal export projects, and identify mitigation for environmental, human and habitat health, community and economic impacts
Greater Spokane Chamber of Commerce	Washington	Request for project site-specific EIS; the proposals are important for maintaining regional economic competitiveness
Greater Spokane Incorporated (Chamber of Commerce)	Washington	Request for project site-specific EIS at GPT that ensures rail traffic is protected; minimizes at-grade crossings; maintains water and air quality; and creates jobs and local and state tax revenues
Heron Habitat Helpers, John Havekotte	Washington	Environmental and ecological impact on aquatic and bird habitats from coal dust and noise pollution along entire railroad corridor near shoreline and estuarine areas
International Longshore Warehouse Union, Leroy Rohde	Washington	Concerns about scoping meeting signage; request for project site-specific EIS
International Union of Operating Engineers, James Garrett	Washington/ Idaho	Rail and road infrastructure improvements necessary for mitigating human health, traffic, local economy, community impacts; determine equitable cost distribution for financing improvements such as grade separation
Kent Chamber of Commerce	Washington	Analyze congestion impacts on freight mobility, local economy, communities, air quality, human health and quality of life from delays due to increased coal train traffic; impacts on commuter rail capacity
Lake Pend Oreille Waterkeeper	Idaho	Request for Programmatic EIS studying environmental, ecological, economic, traffic, natural resources, public health and community impacts throughout entire transportation corridor; cumulative impact of coal extraction, shipment and combustion in Asia on climate change and local air pollution
Lands Council	Washington	Cumulative and indirect impacts of coal extraction, shipping, consumption: environment, congestion, noise, commerce

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
League of Woman Voters, Bellingham-Whatcom County	Washington	Request cost benefit analysis studying air and water quality impacts from coal exports, effect on global climate change from coal consumption in Asia, compared to tax revenue projections; include cost of cleanup and redeveloping site due to loss of coal demand
League of Women Voters of Bellingham-Whatcom County, Jayne Freudenberger	Washington	Request for Programmatic EIS to study cumulative impacts on human health from coal transport from Powder River Basin to all proposed Pacific Northwest export terminals; cost-benefit analysis on direct and indirect effects of reduced air quality and cost of medical treatment and delayed emergency vehicles at crossings; mitigation cost should be Applicant responsibility
League of Women Voters of Seattle-King County, Judy Bevington	Washington	Cumulative economic, health, ecological and environmental impacts from shipping coal between Powder River Basin and Asia, including climate change impacts
League of Women Voters of the San Juans, Sarah Crosby	Washington	Environmental, economic, tourism and health impacts on San Juan Islands from increased vessel traffic, increased spill potential and ensuing ecological damage
League of Women Voters of Thurston County, Allyson Brooks	Washington	Environmental, economic, health, Tribal and cultural impacts from coal trains in Thurston County; hazards and cleanup from potential spills; congestion and emergency service delays at crossings; cumulative impacts on climate change and human health
League of Women Voters of Washington, Kim Abel	Washington	human health impacts of coal dust and diesel particulate matter along train routes; impacts on traffic, including emergency response and commerce, due to crossing delays; impacts of vessel traffic on fisheries, local economy and tourism; cumulative impacts on climate change from coal consumption
Lopez Island Family Resource Center, Carla Morgan	Washington	Health, community, tourism, economy impacts on Lopez Island related to coal export operations, accidents/spills
Lummi Island Conservancy	Washington	Impacts from coal/oil spill risk, marine environment and habitats, marine industries, recreational fishing and boating, tourism and economy and human health
Lummi Island Watershed Enhancement Committee	Washington	Cumulative impacts on marine habitat, ecosystem and natural resources in Puget Sound from increased vessel traffic, noise and spill risk; direct impacts on marine environment from air pollution and climate change; impacts on water quality and supply in Nooksack River from coal spray and runoff
National Association of Manufacturers	National	Request to not expand NEPA analysis beyond project-specific action area (programmatic)
National Extraction Association	National	Request to not expand NEPA analysis beyond project-specific action area (programmatic)
Newport Presbyterian Church	Washington	Environmental, natural/scenic resource and human health impacts from coal dust dispersion and increase in train and vessel traffic (Specifically in San Juan Islands); impacts on climate change
Nisqually Delta Association	Washington	Require all plants burning coal passing through Washington state ports to adhere to same air quality standards as enforced in Washington

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
Northern Plains Resource Council	Montana	Request for programmatic EIS along entire transportation corridor to Powder River Basin to review agricultural impacts
Northwest Environmental Defense Center	Oregon	Request cumulative programmatic EIS to account for all environmental and health impacts of the numerous Pacific Northwest coal export terminal projects, including extraction, shipping and combustion processes
Northwest Washington Central Labor Council	Washington	Request for project-specific EIS for GPT, economic study to tabulate direct and indirect economic benefits and potential costs to local communities and analysis on emergency response in case of spills; request for project-specific EIS
NW Jobs Alliance	Washington	Economic impacts through job growth and local tax revenue in region with relatively below-average wages and high cost of living
NW Jobs Alliance (Small City Caucus: Blaine, Everson, Ferndale, Lynden, Nooksack, Sumas)	Washington	Request for project site-specific EIS; economic impacts through job growth, local tax revenue and expansion of U.S. export capacity; consistency of proposal with long-range land-use plans
Orca Network	Washington	Request for EIS to study cumulative effect of large vessel traffic and noise increase on spill risk and marine ecosystem, ability for spill response system to protect natural resources and measures for shipping industry to minimize spill risk and maximize spill response
Oregon Physicians for Social Responsibility	Oregon	Include Programmatic EIS and health impact assessment with cumulative impacts on study area-wide effects of greenhouse gas emissions from overseas coal consumption and coal dust impacts on drinking water sources
Pilchuck Autoon Society, Kathleen Snyder	Washington	Conduct regional EIS to assess cumulative effects on ecosystems and communities in Puget Sound region, including impacts on environment, recreation, and tourism from coal trains.
Pilgrim Congregational United Church of Christ – Anacortes	Washington	Impacts of increased shipping traffic on existing shipping lane congestion and risk of accidents/spills from collision
Preserve Our Islands	Washington	Request for peer-reviewed programmatic EIS to measure cumulative, area-wide environmental, social and public health impacts from all Pacific Northwest coal export proposals, including extraction, shipment and consumption phases; impacts on marine habitats from vessel shipments; environmental justice and Tribal impacts
Protect Whatcom	Washington	Request for economic impact assessment to determine net benefits of the proposals, including entire rail and sea shipping corridor; adverse economic, environmental, health and community impacts should be monetized with sources of mitigation funding identified

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
Protect Whatcom, Terry Wechsler	Washington	<ul style="list-style-type: none"> Request regional EIS to study cumulative environmental and health impacts from all Pacific Northwest coal export proposals and increased coal train and vessel traffic along entire transportation corridor; impacts from accidents and spills on aquatic ecosystems, including financial cost for governments in cleanup and recovery Impacts on industrial supply of land in Whatcom County from developing GPT site; precludes ability to export resources grown or manufactured locally and in-state; lack of industrial park in current terminal plan Request programmatic EIS to study cumulative impacts of all Pacific Northwest coal export terminals from Powder River Basin to coast, proposed mining leases and expansions and Powder River Basin rail proposals
Puget Sound Advocates for Retirement Action	Washington	Environmental, human and habitat health and climate change impacts; crossing delays from increased coal train traffic
Puget Sound Keeper	Washington	Impacts on Puget Sound marine environment and freshwater tributaries, local residents and communities; cumulative impacts of coal extraction, shipping, consumption
Puget Sound Partnership, Marc Daily	Washington	Request for area-wide EIS studying cumulative environmental, human and habitat health, community, economic, agricultural, Tribal and climate change impacts and mitigation measures from coal extraction, shipment and export; impacts from accidents/spills, runoff, coal dust and crossing delays; impacts on commuter rail traffic
RE Sources for Sustainable Communities	Washington	Indirect effects on wetlands and habitats from runoff, toxicants & particulate matter, increased impervious area; impact on public access to the Gulf Road; direct, indirect and cumulative impacts on environment, health, noise, vibration, local economy and tourism, Tribes
Rosemere Neighborhood Association	Washington	Request for Programmatic EIS studying cumulative regional impacts on environment, human health and local economy along all corridors proposed to carry extensive coal shipments from extraction to consumption; classify coal trains as pollution point sources and railroad corridors as spill hazard zones
Sacajawea Audubon Society, Loreene Reid	Montana	Connected and cumulative environment, health and economic impacts from increased coal train traffic along entire corridor to Powder River Basin
Safeguard the South Fork	Washington	Evaluate impacts of coal transport on entire BNSF corridor in Whatcom County, including the Farmland Route; consider economic and environmental impacts beyond Cherry Point UGA and impacts of proposed commodities on Cherry Point Aquatic Reserve to assess purpose and need of the proposals as well as alternatives; request study of all existing rail lines and potential rail expansion projects in Whatcom County; environmental, human and habitat health, economic and community impacts from coal train traffic on Farmland Route

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
San Juan Marine Resources Committee	Washington	Environmental, ecological, economic, recreation and health impacts from proposed increased shipping traffic and coal transport through marine waters surrounding San Juan County, including risk of spills and climate change impacts
Seattle Art Museum, Kimerly Rorschach	Washington	Impacts of coal dust and diesel particulate matter emissions on Olympic Sculpture Park resources, visitors and surrounding habitat; explore mitigation for congestion, security and health impacts from increased delay due to train traffic
Seattle Human Rights Commission	Washington	Request regional EIS evaluating combined environmental, traffic, Tribal and human health impacts from coal extraction, transport and combustion; assess regional impact of coal shipments on human rights to life, health and to clean and safe water across geographic boundaries; impacts from crossing delays on emergency services
Sightline Institute, Eric de Place	Washington	Analyze coal dust loss during rail transport, dust control measures at terminal, human and habitat health impacts from coal dust, congestion and freight mobility impacts from increased train traffic; include worldwide and regional environmental impacts from coal combustion in Asia
Skagit Audubon Society	Washington	Study cumulative environmental impacts on bird and other wildlife populations and habitats from coal trains, coal vessels and terminal operations along entire transportation corridor;
Skagit Land Trust	Washington	Request EIS to study all direct, indirect and cumulative environmental and ecological impacts on natural/scenic resources and marine-related industries along rail corridor in Skagit County; impacts include increased train traffic and possible expansion of rail lines and sidings, coal dust, diesel Particulate Matter, noise and spill risk
Society for Conservation Biology	National	Cumulative environmental and ecological impacts caused by increased train/vessel traffic, coal dust and diesel particulate matter pollution along entire shipping corridor and at terminal; risk of derailment/spills during transport; loss of wetlands and marine ecosystems due to GPT construction; ecological impacts of increased train and vessel traffic, impacts of potential rail expansion; cumulative air pollution from coal consumption in Asia; costs of deferred or displaced "green" economic development opportunities
Southwest County Coalition	Washington	Environmental, economic, ecological, health, noise, congestion and quality of life impacts from increased train traffic and emissions in Marshall and Cheney, Wash.; impacts on public safety from crossing delay for emergency services; risk of spills due to derailments; direct wildlife impacts due to fatalities along railroad corridor; explore financial responsibility of environmental and traffic mitigation
Spokane Regional Labor Council	Washington	Request for project site-specific EIS; permits necessary for mitigation of grade crossings and increased vessel traffic due to expansion plans at Canadian terminals; coal dust concerns overblown due to lack of concern for wheat dust impacts

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
Stanwood Area Merchants Association	Washington	Traffic delay impacts from increased number of trains affect local access to business district by shoppers, freight and emergency vehicles; impacts of noise, dust and vibration on local businesses; impacts on planned revitalization efforts in downtown
Students for Renewable Energy (Western Washington University)	Washington	Short- and long-term impacts from coal dust, diesel particulate matter, noise on health, environment, endangered species and other natural resources
Sumner Neighborhood Association	Oregon	Request EIS studying public health and air quality impacts along entire shipping corridor from Powder River Basin to GPT, including rail and barge transport in the Columbia River Gorge
Surfrider Foundation, Northwest Straits Chapter	Washington	Impacts on climate change from coal consumption; GPT construction impacts on marine habitat; environmental and ecological impacts of coal dust dispersion along shipping route and at GPT; impacts of increased vessel traffic on marine mammals and organisms
Sustainable Edmonds, Richard Brisbee	Washington	Impacts on erosion and landslides, environment, ecological, natural/scenic resources, tourism, recreation, economic, public services, traffic and health impacts from dust and delays caused by coal train traffic in Edmonds; immediate site impacts on Cherry Point Aquatic Reserve; cumulative climate change impacts
Thornton Creek Alliance	Washington	Request for Programmatic EIS including marine and railroad shipping corridors studying environmental, economic, health and cumulative impacts
Transition Fidalgo and Friends	Washington	Measure cumulative release of greenhouse gas emissions from diesel particulate matter and coal energy; impacts on climate change from coal extraction, rail and vessel shipment and unregulated combustion in Asia
Trust for Public Land, The	Washington	Economic benefits from increased employment in construction, rail, international trade and terminal operations; environmental, human and habitat health impacts from released coal dust during train and vessel shipment, train and vessel accidents and diesel particulate matter emissions
U.S. Grains Council, Floyd Gaibler	National	Request for project site-specific EIS studying immediate environmental impacts and potential for the proposals to create jobs and grow economy
United Association of Plumbers and Steamfitters Local #44, Mike Foley	Washington/Idaho	Rail and road infrastructure improvements necessary for mitigating human health, traffic, local economy, community impacts; determine equitable cost distribution for financing improvements such as grade separation
United Steel Workers	National	Request for project site-specific EIS; economic impacts from growth in jobs and local tax base
United Transportation Union	National	Economic impacts from job creation outweigh environmental and community impacts from coal dust and grade crossing delays

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
Vancouver Audubon Society	Washington	Request programmatic EIS to study cumulative global climate change impacts of all proposed Pacific Northwest coal export terminal projects, including coal extraction, shipping and combustion impacts
Washington Association of Naturopathic Physicians, Robert May	Washington	Request health impact assessment studying human health impacts from coal dust and diesel PM emissions; long-term medical and human costs can outweigh anticipated economic benefits
Washington Conservation Voters, Whatcom County Chapter	Washington	Examine direct, indirect and cumulative impacts of the proposals on ecosystem functions; ecological impact mitigation should be determined using watershed/landscape-based analysis to enhance ecological functions of critical areas and shorelines
Washington Labor Council, AFL-CIO	Washington	Request for project site-specific EIS; economic impacts from construction and operation jobs at GPT and increased local tax revenue; proposals exceed state environmental standards
Washington Machinists Council	Washington	Economic impacts from job creation, increased local tax revenue and reduced trade deficit; support research for clean energy manufacturing; revenue stream from the proposals should be established for crossing improvements
Washington Physicians for Social Responsibility	Washington	Request for health impact assessment to study health and economic impacts from treating new or exacerbated medical conditions related to diesel particulate matter emissions and noise; crossing delays for emergency services
Washington Public Ports Association, Eric Johnson	Washington	Request for site-specific project EIS; evaluate fiscal and economic development impacts from the proposals
Washington State Building and Construction Trades Council	Washington	Request for project site-specific EIS; proposals will use proven and new technologies mitigate environmental impacts; coal shipped through GPT cleaner than other sources; economic impacts through construction and operation job growth and reducing trade deficit
Washington Ports	Washington	The Washington Ports letter expresses concern about requests to substantially expand the scope of impact analysis beyond what typically occurs under SEPA and NEPA. The letter suggests that this determination could become an unwelcome precedent for other terminal expansion projects involving less controversial products, such as grain, fruit, airplanes, wine, and hay. Additionally, cumulative effects analysis of up to five separate coal export facilities in the Pacific Northwest would not be required because only three of the facilities are in any stage of preliminary or submitted application and an analysis would require speculation.
Waterkeeper Alliance	National	Request Programmatic EIS to assess impacts from climate change, mercury pollution and externalized health and environmental costs during coal extraction, shipment and consumption
West Coast Environmental Projects Director Surfers' Environmental Alliance	California	Congestion, Pollution, ecosystem, economic, health, climate change and noise impacts from coal train traffic, increased tanker traffic and risk of accidents/spills; request area-wide EIS of all Pacific Northwest coal export proposals and cumulative impacts
Western Business Roundtable	Western U.S.	Request for project site-specific EIS

Table 7-1
Summary of comments from organized groups

Name of Organization	Location	Summary of Issues
Western Organization of Resource Councils	Montana	Request for EIS on specific project action area (GPT and Custer Spur)
Whatcom County Marine Resources Committee	Washington	Ecological impacts from artificial night lighting, coal dust and cargo spillage, terminal construction and operation, underwater noise and risks of spills and collisions due to increased vessel traffic
Whatcom Land Trust	Washington	Impacts on conservation and habitat values: California Creek Timberline Preserve, Madrona Point Estuary Preserve, Pigeon Point Tideland and Upland Preserve, South Fork Nooksack
Whatcom Marine Mammal Stranding Network	Washington	Request for biological assessment to include impacts on marine mammal populations from air and noise pollution, vessel collisions, site habitat removal and loss in food sources
Whidbey Environmental Action Network	Washington	Cumulative and indirect impacts of coal extraction, shipping, consumption: climate, human health, pollution, environment and habitat
Ziontz, Chestnut, Varnell, Berley & Slonim (Brian Gruber/ attorneys for League of Women Voters of Bellingham/Whatcom County and North Cascades Audubon Society)	Washington	Impacts of coal dust on aquatic environment; GPT wharf located over herring mitigation corridor and schooling area; request for robust mitigation requirements, including all mitigation required under 1999 agreement for previous GPT plus additional measures to account for increased size and inclusion of coal as primary export commodity

7.1.1 Organizations that collected comments from individuals

Organizations that submitted comments from individuals are listed in Table 7-2 below. These organizations either gathered comments through an online form on the organizations' website or comments were collected at meetings or by mail and submitted by hardcopy via mail to the EIS process team. Many of the comments collected were form letters; however, individuals often changed the form text, added to the comment, or changed it completely. Regardless of how the comments were submitted, all comments were read, reviewed, and summarized by the EIS process team. Comments from individuals are summarized in Section 5.0, Public comments summarized by resource issue.

Table 7-2
Summary of comments from individuals collected by organizations

Name of Organization	Submission Method	Number of Comments Received
350.org	Submitted hardcopies of unique and form comments in bulk from individuals	3,948
Cascadia Wildlands	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	125*

Table 7-2
Summary of comments from individuals collected by organizations

Name of Organization	Submission Method	Number of Comments Received
CoalTrainFacts.org	Submitted hardcopies of unique and form comments in bulk from individuals	361*
Credo Action	Submitted unique and form comments in bulk from individuals via the website and email	72,241
Earth Ministry	Submitted hardcopies of unique and form comments in bulk from individuals	399
EcoWatch	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	1,293*
Friends of the Columbia Gorge	Submitted hardcopies of unique and form comments in bulk from individuals	516
Friends of the Columbia Gorge	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	453*
Fuse Washington	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	285*
Greenpeace	Individuals could submit comments via the organization's website, which were then emailed to the GPT EIS email address	1,170*
National Wildlife Fund	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	2,977*
Northern Plains	submitted hardcopies of unique and form comments in bulk from individuals	155
Physicians for Social Responsibility	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	945*
Power Past Coal	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	3,320*
Resources for Sustainable Communities	Submitted hardcopies of unique and form comments in bulk from individuals	251
Sierra Club	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	4,273*
Sierra Club Portland	Submitted hardcopies of unique comment cards and letters and form comments in bulk from individuals	476
Sierra Club Seattle	Submitted hardcopies of unique comment cards and letters ,and form comments in bulk from individuals	1,800
Sierra Club Spokane	Submitted hardcopies of unique comment cards and letters and form comments in bulk from individuals	850
Western Organization of Resource Councils	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	139*
Comment Card "I Support GPT"	Submitted hardcopies of unique and form comments in bulk from individuals	213

Table 7-2
Summary of comments from individuals collected by organizations

Name of Organization	Submission Method	Number of Comments Received
Form email "Approve GPT"	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	171*
Form email "I Support GPT"	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	111*
Form email "Stop GPT"	Individuals submitted comments via the organization's website, which were then emailed to the GPT EIS email address	12,523*

*These totals only include form comments. Comments received by email that contained altered text from the form comment were uploaded as individual comments.

7.2 *Businesses*

The proposal received 37 scoping comments from local businesses, most of which expressed reservations about the impacts of the GPT and shipping along the rail corridor and at sea. However, some businesses, did not favor widening the environmental review study area beyond the action site. Comments on the proposal were organized in the following four categories: planning process and EIS; environmental and health impacts; other impacts from increased train and vessel traffic; and fiscal impacts.

7.2.1 **Planning process/EIS**

Many businesses wish to see a programmatic or an area-wide EIS that reviews direct, indirect, and cumulative impacts related to economic, social, health, and environmental costs along the entire shipping corridor, as well as the local and worldwide impacts of using coal as an energy source. This area-wide EIS could include analysis for all proposed port sites in Oregon and Washington. Public meetings should be held everywhere where impacts are expected. Some have requested that the GPT proposal evaluate the Farmland rail corridor and include potential impacts in Skagit and eastern Whatcom counties, while others thought that the site should be studied for the use of alternative energy development.

7.2.2 **Environment and health**

Business comments demonstrated great concern for overall public and environmental health including human and habitat health, air and water quality, and climate change. Terminal construction and new right-of-way acquisition for rail would harm wetlands and natural habitats. Increased vessel and train traffic accessing the port would affect air and water quality due to greenhouse gas emissions from diesel engines, displacement of contaminated sediment layers during anchoring and discharged ballast from ships. Fugitive coal dust emissions during shipment and storage as a result of runoff or

windblown particles need to be analyzed for impacts on surrounding populations and property, environmental quality, and habitat health, with the suggestion that all coal shipment and storage be enclosed. Impacts on agricultural production from terminal and mining operations, such as noise and vibration and water usage, is another concern. In addition to construction and operation, the risk of impacts resulting from accidents and spills should also be included.

Opposing views did not support studying direct, indirect, and cumulative impacts of a cargo terminal project to include the operation of the freight transportation system that brings products to that terminal. Greenhouse gas emissions should not be evaluated for the international shipments of a product that is available from other world market sources (especially if the impact of greenhouse gases is not eliminated or even reduced by switching from one source to another). It would require guesswork concerning the future actions of foreign governments and economies and would result in pure speculation.

7.2.3 Train and vessel traffic

Businesses mentioned several issues related to increased number of trains and longer trains along the BNSF corridor. Areas of concern included diminished access to parks and recreation, downtown retail areas and employment centers, and schools; delay imposed on medical responders in case of emergency; property damage from train vibrations; noise impacts on parks and local habitats; impacts on passenger rail service; possibility for increased train derailments and other safety issues; disruption of river traffic on the Snohomish River in Everett; and right-of-way impacts from new rail construction on local parks and properties.

Some businesses felt increased vessel traffic in the Salish Sea from this proposal and the proposed Canadian pipeline expansion would potentially cause delays to state ferry and private marine transportation and represent a safety hazard to other boats due to the risk of collision, fire or other incident. A lack of space was cited for anchoring ships, particularly in the San Juan Islands. Those in the tourism industry also felt increased shipping traffic would detract from the natural scenery along the coastline.

7.2.4 Fiscal

The economic impacts of increased train traffic were frequently mentioned, specifically whether purported job benefits would be offset by losses to local businesses. Several commenters mentioned that diminished access to their stores due to increased wait times at train crossings would adversely affect their business and local property tax revenues. This impact includes lack of access for both shoppers and freight trucks making deliveries. Some businesses felt the proposal would harm the regional reputation for sustainability, affecting the local tourism economy, and deterring people from relocating to the area. Proposal impacts on local agriculture, ranching, fishing, and

Tribal operations also require further consideration. The question of how to fund future community investments related to the proposal, such as grade-separated crossings and basic city services was also an issue. Some feared that property taxes would have to be increased to pay for improvements, while others felt that the proposal would depress property values. Businesses sought review of how the proposal might preclude new local tax revenue from waterfront redevelopment in Bellingham and other locations. In addition, costs from cleanup, mitigation, and restoration, as well as ambulance delays and treating proposal-related medical conditions, need to be considered.

7.3 Applicant comments

The proposals received six scoping comments from proposal applicants and other entities with a vested interest in the GPT. The Applicants submitted comments related to the following categories: project scoping and EIS, environment and health impacts, and other impacts from increased train traffic.

7.3.1 Scoping/EIS

The Applicants believe that the scope of the EIS should be limited to direct, indirect, and cumulative impacts that have a reasonably close causal relationship to the proposals. They state that the proposals do not warrant a programmatic or area-wide EIS, which would entail a system-wide or lifecycle impact analysis of coal production and export looking at the indirect and cumulative effects of using the commodity as an energy source. An area-wide EIS could also encompass multiple commodity terminals under various stages of development in Oregon and Washington. The commenters expressed concern that an area-wide EIS would be used by opponents to delay the proposals for several years, harming economic growth and contradicting the Obama Administration's push for regulatory streamlining. Based on court precedent and existing law, NEPA should only apply to proposal-specific terminal and shipping impacts at Cherry Point and Custer Spur and areas immediately surrounding the proposal site and the development of targeted and effective mitigation to respond to these impacts. Any other indirect or cumulative impacts such as lifecycle greenhouse gas emissions are too distant and speculative to include in the project EIS.

According to the Applicants, the extraction, long-range transport, and combustion of coal, including overseas activities, would lack a causal project relationship because the Corps does not have jurisdiction over these activities. Moreover, these activities, such as rail or mining operation, have previously been scrutinized and are already in business. Therefore, conducting an area-wide EIS in this situation would be unprecedented and require that all commodities shipped on the transportation network be studied for lifecycle impacts during an EIS for each new project. Currently proposed port projects in the Pacific Northwest should be evaluated individually as they are geographically

separate and on their own development timetables. In addition, any traffic and air quality impacts should be confined to the Custer Spur proposal action area.

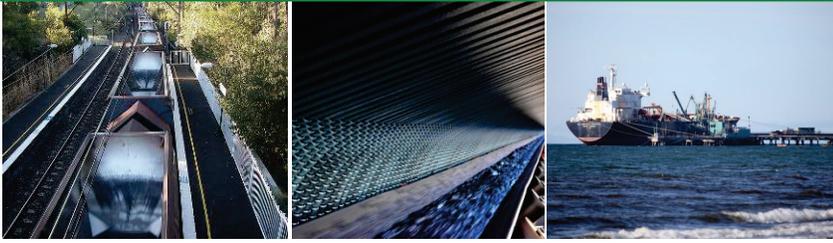
7.3.2 Environment and health

The Applicants asserted that they have researched the impacts of coal dust escaping from cars loaded at Powder River Basin mines and effective methods of preventing coal dust loss from loaded trains. Coal has been transported through Washington to Canadian ports for decades, and there has yet to be proven evidence that coal dust from trains has negatively affected communities in Washington. Best practices in loading techniques and technology at mines, such as treating loads with surfactants, will address this issue.

The Applicants also provided comments on diesel emissions from trains, stating that they are working with the regulatory agencies to analyze impacts of the proposals on air quality in the action area. In addition, locomotives are becoming more fuel-efficient, and the newest models are releasing 69 percent fewer emissions than older models. While volume and distance of freight moved increased 29 percent in the past 10 years, fuel consumption has increased only 14 percent. Emissions and fuel consumption are further reduced with idle-control mechanisms that shut down idle locomotives and are found on 90 percent of the train fleet.

7.3.3 Train traffic

The Applicants submitted comments related to proposal impacts on freight train traffic and associated travel delays along the rail corridor. Because rail traffic is complex, the Applicants state that making future traffic projections is difficult and speculative. The Applicants mentioned that government studies predict overall statewide freight rail traffic in Washington will increase 13 percent by 2040 due to various economic conditions, and that it is not foreseeable that the proposals would increase traffic on any particular line given the number of existing and potential future terminals operating independently of the proposals. Furthermore, the Applicant states that studies showing the rail network at capacity are out of date and have not taken into account recent track investments. There is adequate capacity on the BNSF mainline for the proposals, with no upgrades to the rail network necessary to accommodate traffic to the terminal other than proposed upgrades to the Custer Spur. In addition, train traffic would continue to be managed to minimize crossing delays, with 24-hour emergency contact numbers posted at all public grade crossings for use during crossing emergencies.



8. Suggested alternatives

Besides support for a no action alternative, comments related to alternatives fell into four subcategories: terminal project site; railroad transport; marine transport and vessel operations; and use of coal as a power source.

8.1 *No action alternative*

The no action alternative should identify and analyze all potential train routes and expected coal traffic if the proposals are not built and should account for loss of jobs, revenue, income, and lost opportunity to expand public services. The no action alternative should recognize existing coal exports from the west coast of Canada.

8.2 *Terminal project site*

- **Comments related to alternative uses** – Consider the following alternative uses for the proposed terminal site:
 - Ferry terminal and boardwalk, with spiritual house for Native Americans and Buddhists, and a conference and education center.
 - Returning the land to the Lummi Tribe.
 - Organic farming
 - Development of only the west loop as well as loading and berthing/wharf infrastructure for up to one cape size vessel.
 - Use of the site for a salmon hatchery
- **Comments related to viability of alternatives** – Evaluate the viability of the project compared to using existing bulk commodity transfer facilities such as the Mount Baker Terminal. Consider whether the available alternatives would fail to mitigate harm to the quality of life in communities adjacent to the rail corridor, including in Bellingham.
- **Comments related to reducing the size of the proposals** – Analyze alternative configurations or reduce the scale options of key components of the project. Scaling the project back to allow only the original pier contemplated in the Aquatic Reserve Management Plan (2010) and Settlement Agreement (1999). This plan contains environmental analysis and studies highlighting the fragile nature of the herring, water quality, and shoreline that could be adopted as part of the draft EIS and identifies potential

proposed options that should be considered as part of the draft EIS. Development of the original proposal permitted via SHS92-20 and MDP92-3 provided that the items specified within the 1999 Settlement Agreement have been completed to the satisfaction of the U.S. Department of Energy, Washington Department of Fish and Wildlife, and the Washington Environmental Council. The East Loop stockyard and all proposal features designed to enable operations of the East Loop coal stockyard should be withdrawn/stricken/completely and permanently eliminated from the proposals.

- **Comments related to alternative locations** – Use existing ports around the country (Gulf, Great Lakes, East Coast), where planned coal-export expansions are under way (see www.csgcoal.sqsp.com) instead of constructing this new port in an Aquatic Reserve and in the middle of treaty fishing areas. Consider other locations for the port site that have or have not yet been considered, including an existing port facility, a site on the Olympic Peninsula, along the Columbia River or on a manmade island. Specific locations suggested include:
 - Aberdeen, Wash.
 - Astoria, Ore.
 - Boardman, Ore.
 - Coos Bay, Ore.
 - Grays Harbor, Wash.
 - Great Lakes, Mich.
 - Gulf of Mexico
 - Longview, Wash.
 - Point Roberts, Wash.
 - Prince Rupert, B.C.
 - Port Westward, Ore.
 - Portland, Ore.
 - San Francisco
 - Seattle
 - Tacoma
 - Texas
- **Comments related to function and configuration of terminal** – Analyze terminal alternatives that assume different levels of operation and smaller footprints, including terminals that have full coal shipment traffic, partial coal production, and no coal production. Include enclosed storage and loading facilities in the analysis. Determine the appropriate size and orientation of the pier at the terminal, as well as potential anchoring locations. Compare the potential impacts of using diesel with onshore electrical power supply at the dock. Address potential negative impacts if the site is able to change uses after environmental approval. For example, a grain terminal approved and built through the EIS process could be adapted into a coal terminal at a later date.

- **Comments related to pier alignment and design and alternatives**
 - Use an ecologically preferable location and alignment for the overwater structure 1,000 feet south of the proposed location, intended to reduce adverse impacts of the proposals to pre-spawning herring. The EIS should analyze the Washington Department of Fish and Wildlife-recommended alignment and other alignments and assess the potential, adverse impacts and potential mitigation measures for each alternative. The EIS should include an alternative that is based upon a comprehensive analysis of herring migratory patterns from deep waters to the nearshore environment of the Cherry Point Aquatic Reserve. The design of this alternative should locate overwater structures to avoid disruption to these migratory patterns, either by the structure itself, or from the vessels calling in the proposed structure. Alternative overwater structure designs should also be evaluated to avoid and minimize impacts such as decking material, artificial lighting and other considerations.

8.3 Railroad transport

- **Comments related to the location and impacts of alternate shipping routes** – Consider the following routes and impacts:
 - Routes with a lower risk for mudslides and fault lines, such as new corridor along I-5 or SR 9 with dedicated passenger and freight tracks.
 - Routes through less-populated areas, such as farther inland from the coast in South Fork Valley to avoid impacts on communities such as Bellingham.
 - Routes that avoid traveling along the Columbia River Gorge. A new line could be built between Pendleton, Ore., and Wenatchee with a tunnel through Stevens Pass and new trackage to Everett.
 - Routes that ship coal to existing export terminals in Canada or on the U.S. East Coast rather than through a new terminal on the U.S. West Coast.
 - Coast line in Everett.
 - UP corridor on the Oregon side of Columbia River Gorge.
 - Routes that provide alternatives to the Custer Spur location, including the Custer to Ferndale double track project and a rail spur at Slater Road.
- **Comments related to alternate or multiple routes** – Evaluate impacts of constructing a new right of way. Address whether eminent domain and other property impacts may cause loss of prime farmland. Analyze communities along alternate routes for impacts and mitigation in case the original route is rejected (example given is Bellevue if Seattle rejects the project). Consider the use of multiple routes, such as the BNSF and UP corridors along the Columbia Gorge. Address whether the shipper would face financial penalties if trains are diverted to unauthorized lines.

- **Comments related to alternate modes of transport** – Study the impacts of exclusively using waterways to transport coal or using airplanes instead of rail. Consider using barges along the Columbia River instead of the BNSF corridor.
- **Comments related to alternatives for increasing volume and capacity of rail transport** – Study a reasonable range of alternatives for increasing rail capacity in Whatcom County and potential impacts of new siding tracks along the Bellingham waterfront between Mount Vernon and the Custer Spur.
- **Suggest combining grade crossing closures and adding grade separations** - As an alternative to negatively affecting the nine at grade crossings (vehicle and multimodal) in Bellingham, consider the following combinations of at-grade closures and construction of new grade-separated crossings; at-grade closures of Pine/Wharf Streets, Central Avenue, and/or C Street in tandem with construction of new grade separated crossing: Commercial Street Bridge (down to Waterfront District) and a new Cornwall Avenue Bridge at the time the BNSF tracks are relocated to the east at the base of the bluff.
- **Consider the development of new railroad sidings** - As an alternative to negatively affecting existing available capacity on the Bellingham Subdivision Mainline for freight and passenger service, consider the development of a new railroad siding in a minimum of two locations between Mount Vernon and the Custer Spur.
- **Alternatives should include rail upgrades/improvements** - Assess the capability of the existing BNSF rail line running parallel to SR 9 from north of Mount Vernon north to Sumas in terms of capacity, structural integrity and overall suitability for potentially accepting some increases in freight train traffic. Potentially, the train traffic on this corridor could be limited to freight destined for Canada in order to free up the Bellingham Subdivision Mainline for GPT-generated trains. Bellingham recognizes that residents and businesses on this rural alignment, as well as those within Whatcom County's smaller cities, may be averse to this type of analysis and that any necessary or required upgrades and improvements may also have associated negative impacts.

8.4 Marine transport and vessel operations

- **Comments related to marine and natural resource impacts based on specific shipping routes** – Analyze alternative routes through the Strait of Juan de Fuca or the Inside Passage. The San Juan Islands should not be affected by shipping routes. The scope of the study should include all of the northern Salish Sea, including the projected increased traffic from shipping terminals in British Columbia, and evaluate multiple alternatives for reducing potential incidents, including routes, operations, and traffic control.

- **Comments related to transport safety** – Evaluate suggestions to pelletize coal in the terminal before shipping it to Asia to make it safer to transport and assess value to proposals of jobs provided by this suggestion.
- **Comments related to alternatives for vessel traffic** – The EIS should analyze alternative berthing times and seasonal restrictions to ensure that cargo vessel and tug operations do not adversely affect herring spawning behavior at Cherry Point.

8.5 Use of coal as a power source

- **Comments related to alternative technologies** – Advocate public conservation measures and investment in renewable energies instead of building a coal terminal. Include alternatives to strip mining, including the locations of mines, the amount of coal mined, and the practice of mining coal altogether. Address ways the coal industry here and abroad could invest in research and develop technology that permanently captures carbon dioxide emissions. Funds should be set aside for developing alternative energies. Consider establishing a fee for every British thermal unit (Btu) of coal exported and use the revenue to provide 10 times the Btu of solar panels installed in the U.S.
- **Comments related to alternative industries** – Study the use of the terminal property by other industries. The site could be used for the production of clean energy technologies. Study the use of the terminal to ship solely non-coal commodities, such as crops and food.



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