



**King County**

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**JACK LOUWS  
COUNTY EXECUTIVE**

*Forwarded To  
Planning - write note  
of acknowledgment.*

January 31, 2012

Ted Sturdevant  
Director, Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

The Honorable Jack Louws  
Whatcom County Executive  
311 Grand Avenue, Suite 108  
Bellingham, WA 98225

Dear Director Sturdevant and Executive Louws:

I have been closely following the proposal by Pacific International Terminals, Inc., a subsidiary of SSA Marine, to develop a marine terminal at Cherry Point in Whatcom County. The "Gateway Pacific Terminal" would provide storage and handling for the export and import of up to 54 million metric tons per year of commodities, primarily coal from the Powder River Basin of Wyoming and Montana.

I'm concerned about the significant impacts of this proposal on air, water, energy and natural resources, environmental health, land and shoreline use, public services, and transportation in communities along the rail corridor. In addition, the proposal has broader implications for increased climate pollution. These are elements of the natural and built environment required to be considered during environmental review under the State Environmental Policy Act (SEPA). I am writing to provide input onto the scope of the SEPA review for this project, and requesting that your SEPA review include the following areas of analysis:

*Health, Equity, and Social Justice Impacts*

As highlighted in August 2011 by a group of 160 Whatcom County physicians, there are potentially significant public health impacts associated with the project. These include respiratory health impacts of diesel particulate matter associated with increased train traffic, coal dust, and health effects associated with mercury and other heavy metal pollution from open-pit coal trains, noise exposure along the train route, and increased

frequency of long trains at rail crossings, with potential to delay emergency medical response times and increase vehicle-train accidents. The analysis should consider the impacts on communities along the rail corridor, areas that are often disproportionately populated by ethnically diverse and low income communities already experiencing disparities in health outcomes and exposure to environmental pollution.

### *Environmental Impacts*

The SEPA review process should identify and analyze the impacts of construction and long-term operations on sensitive herring populations and eel grass beds within the designated Aquatic Reserve adjacent to the proposed terminal, as well the impacts of coal dust emissions and associated mercury and heavy metal pollutions on water quality, habitat, and listed species along the rail corridor route.

When considering environmental impacts, it is also critical to consider the indirect, cumulative impacts of the project, no matter where the impacts occur. The project and terminal would directly support a huge quantity of coal burning in China. Burning the upper estimate of coal associated with this proposal (48 million tons) would result in more than 100 million metric tons of carbon dioxide equivalent greenhouse gas emissions annually, roughly equivalent to all emissions produced in Washington State. Indirect emissions resulting from this proposal would erase the significant progress and commitment Washington State and many of its communities have made to address the climate change challenge.

### *Economic impacts*

Research by the Sightline Institute has highlighted existing train congestion challenges in Washington, especially at several chronically congested choke points throughout the state. Adding up to eighteen mile-and-a-half long trains per day, without addressing rail capacity and mobility issues, could result in significant impacts to both current and future freight and passenger train traffic. In King County, key industries like aerospace and international trade rely on the rail corridor to move parts and finished products. For example, Boeing uses the rail line to transport fuselages for its expanding 737 production line. Increased use of this corridor by long-haul coal trains could conflict with existing future rail-dependent economic development, like the plans for 737 MAX production.

In conducting SEPA, I urge your agencies to work with the Puget Sound Regional Council, Puget Sound Clean Air Agency, the Port of Seattle, enterpriseSeattle, the aerospace industry, Sound Transit, and cities and counties along the rail corridor to thoroughly document baseline conditions and future plans related to freight and passenger rail capacity along the corridor. Having a clear assessment of current conditions, including freight and passenger rail mobility “choke points”, will be essential

Ted Sturdevant  
The Honorable Jack Louws  
January 31, 2012  
Page 3

to supporting an accurate assessment of impacts from the proposed coal terminal and associated rail traffic.

*Traffic*

In addition to freight and passenger train mobility impacts, addition of eighteen, mile-and-a-half long coal trains has the potential to create significant delays at at-grade crossings, inhibit the travel of emergency vehicles, endanger pedestrians, and cause increased delays in ferry loading and unloading. Traffic delays will have direct economic impacts that also need to be considered in communities along the rail corridor. The EIS should analyze the economic and safety impacts of increased train traffic on other vehicle traffic (cars, trucks, ferries, passenger rail, and transit), and estimate the cost of mitigating these impacts.

Washington's environmental, labor, political and business interests came together in 2011 to phase out the only remaining coal-fired power plant in the state, the Centralia plant owned by the TransAlta corporation. Exporting finite, domestic natural resources for short-term financial gain, while harming our environment and precluding more value-added economic development, would be a giant step backward. Instead, we need to chart a path forward for sustainable economic development, healthy communities, environmental protection, and clean energy. I will continue to follow this issue closely and our staff would be happy to share information on traffic, transit, economic development, health and environment in King County. If you have any questions, please contact Megan Smith, Environmental Policy Advisor, at 206-263-9605, or [megan.smith@kingcounty.gov](mailto:megan.smith@kingcounty.gov).

Sincerely,



Dow Constantine  
King County Executive

cc: King County Councilmembers  
    ATTN: Cindy Domingo, Acting Chief of Staff  
        Anne Noris, Clerk of the Council  
        Jason King, Director of Government Relations, Communications and  
            External Affairs  
Mayor Pete Lewis, City of Auburn  
Mayor Suzette Cooke, City of Kent  
Mayor Denis Law, City of Renton  
Mayor Mike McGinn, City of Seattle

Mayor Keith McGlashan, City of Shoreline  
Mayor Jim Haggerton, City of Tukwila  
Peter Goldmark, Washington State Commissioner of Public Lands  
Dennis McLerran, Regional Administrator, U.S. Environmental Protection Agency  
Tay Yoshitani, CEO, Port of Seattle  
Joni Earl, Chief Executive Officer, Sound Transit  
Bob Drewell, Executive Director, Puget Sound Regional Council  
Craig Kentworthy, Executive Director, Puget Sound Clean Air Agency  
Christie True, Director, Department of Natural Resources and Parks  
Ngozi Oleru, Director of Environmental Health, Department of Public Health  
Carrie Cihak, Director of Policy and Strategic Initiatives, King County Executive's  
Office (KCEO)  
Megan Smith, Environmental Policy Advisor, KCEO