

December 17, 2013

Port Metro Vancouver
100 The Pointe, 999 Canada Place
Vancouver, BC V6C 3T4
Submitted via email to: port_planning@portmetrovancover.com

RE: Comments on Environmental Impact Assessment for proposed Direct Transfer Coal Facility in Surrey B.C.

To whom it may concern:

Thank you for the opportunity to comment on the Environmental Impact Assessment (EIA) conducted by Fraser Surrey Docks on their proposed direct transfer coal facility in Surrey B.C. These comments are submitted on behalf of the following organizations in the United States who would be impacted by this project and the increased rail traffic associated with the proposal; Spokane Riverkeeper in Spokane, WA, The Lands Council in Spokane, WA and Lake Pend Oreille Waterkeeper in Sandpoint, ID. These comments are on behalf of the aforementioned organizations and their respective member bases who are aligned under the broad common goal of environmental protection in their geographic areas.

Another thing connecting our organizations is that they share a BNSF rail line connector known as the "BNSF funnel", a 70-mile stretch of track between Sandpoint and Spokane that sees up to 70 trains a day, according to an Inland Pacific Hub study – (<http://www.inlandpacifichub.org/documents/Modal%20Fact%20Sheets/Modal%20Fact%20Sheet%20-%20Rail%20final.pdf>). This line, extremely important to the economy of our region, has over the last two years been the subject of much discussion and analysis given the litany of coal and oil transport proposals in Washington and Oregon. There are currently three coal export proposals (two in Washington and one in Oregon) and twelve oil transport proposals (ten in Washington and two in Oregon) that are in various stages of permitting and review. All told, the proposed increase in number of trains that could traverse the BNSF funnel from Sandpoint to Spokane then westward to any number of the proposals, could result in up to 60 or 70 additional trains a day, essentially a 100% increase in current traffic. This is a potential reality that is logistically, financially and environmentally illogical. We are writing to express our concerns over your proposal as it is another project that would result in increased train traffic through our communities, and to ask that you delay your decision on the EIA for the direct transfer coal facility in Surrey B.C. until you can properly analyze the impacts to rail communities along the way, communities like Sandpoint and Spokane.

Furthermore, there are simply too many questions and too many unknowns given the onslaught of fossil fuel transporting and exporting proposals in the NW to fully understand the impact of one singular proposal. We urge Fraser Surrey Docks to coordinate with officials in the United States to have a better idea of rail line capacity, rail infrastructure upgrades needed and how those would be financed, and logistics around rail safety and emergency response before any permits are approved.

Our communities are staring down several projects many miles away from us on the west coast that would dramatically impact our way of lives, our health and our natural resources, this is now another one. We respect your permitting processes, but must strongly urge you to start over and widen the scope of your EIA and study how this direct transfer coal facility in Surrey B.C would impact rail communities like ours.

Exporting coal through our communities directly impacts the Lake Pend Oreille watershed and the Spokane River basin in many ways, most notably our discovering that the current coal train shipments through our region are already resulting in coal dust and coal chunks in our waterways, and that an increase in this activity of coal exporting for a facility in B.C. will only increase how often we find toxic coal in our natural resources.

Open coal trains lose huge volumes of coal dust and debris during transportation. According to BNSF studies, between 500 lbs. to 2000 lbs. of coal can be lost in the form of dust for each rail car. In other studies, as much as three percent of the coal in each car (around 3600 pounds per car) can be lost in the form of dust. A study of a West Virginia rail line found that one pound of coal per car per mile is lost from coal trains. At this rate, one coal train with 120 cars traveling 80 miles through Sandpoint, over Lake Pend Oreille and to Spokane over and along the Spokane River could lose just over 10,000 pounds of coal in our region. One coal train per day for 365 days is 3,650,000 lbs. per year deposited in our communities.

Additionally, the scope of the EIA should be widened and must also address the risk of derailment from increased train traffic carrying coal through our region. Increased train transportation, particularly coal trains, poses a real threat of derailments, spills, and impacts to sensitive areas. Coal dust has been documented as a rail ballast contaminant and BNSF has attributed derailments to the ballast contaminated with coal dust. A cursory review of the recent history of accidents illustrates the risks of derailment:

- In July 2012 a coal train transporting Powder River Basin coal derailed near Pasco, Washington, dumping and undetermined amount of coal.
- In July 2012 a coal train derailed in Chicago because a bridge was not designed to carry the weight of coal cars.
- On April 24, 2005, an Amtrak train traveling on the Washington side of the Columbia River derailed within the National Scenic Area.
- In January 2003, a train containing hazardous waste derailed near The Dalles on the Oregon side of the Columbia River. That derailment occurred in a culturally significant area within the Columbia Gorge National Scenic Area, and threatened tribal cultural resources.

Moreover, our members routinely bring up concerns with the BNSF refueling depot in Hauser, Idaho and how it has historically and currently leaks in to the Rathrdrum Prairie – Spokane Valley aquifer, an aquifer that is connected to the Spokane River and which could transport pollutants in to the River

system. The Rathdrum Prairie – Spokane Valley aquifer is also the drinking water source for nearly 700,000 people in Kootenai and Spokane counties in north Idaho and eastern Washington respectively. This refueling depot has had numerous issues with inadequate aquifer protection, can it withstand a massive increase in refueling instances due to increased traffic? This needs to be considered in your EIA and studied very carefully for we only have one shot to protect the Rathdrum Prairie – Spokane Valley aquifer.

And finally, if corporations export coal to Asia they are causing air pollution in the western United States. Coal export from the Pacific Northwest has the connected action of importing poisonous air pollution that is deposited into lakes, streams and rivers, toxifying our fish and threatening the health, vitality and brain development of our children. Every single waterbody in the U.S., including Lake Pend Oreille and the Spokane River has a mercury advisory on it. This proposed direct transfer coal facility will only add to that problem. What is being done to address this?

Again, thank you for the opportunity to comment on this. Because of the potential impacts to our communities and our natural resources, we strongly urge you to consider stepping back and widening the scope of the EIA to include studies of impacts on rail communities like Sandpoint, ID and Spokane, WA and every rail community between source and facility.

If you have any questions, you can reach any of us at the information provided below in our signatures.

Thank you,

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