



Coal Shipments and Washington's Ports: How we view this issue

The Issue

Proposals to site coal export terminals in the Pacific Northwest have resulted in vocal opposition by local communities and environmental groups. The concerns include the construction and development of the terminals themselves, perceived impacts to rail capacity, environmental effects, traffic delays, and overall quality of life. Subsequently, these groups have submitted comments to various agencies requesting a programmatic or area-wide environmental impact study (EIS) of all proposed sites in the Pacific Northwest. With proper investment, WPPA is confident of our region's ability to accommodate anticipated increased rail shipments of all cargoes. Our trade forecasts are bullish, and requiring a programmatic EIS on this issue is an unwarranted precedent in the most trade-dependent state in the nation.

Broader effects of a programmatic or area-wide EIS

Currently interest groups are requesting a programmatic EIS only for bulk coal shipments, but it is legally difficult to distinguish coal from other kinds of cargo. Many bulk products are shipped using similar methods, over similar distances, impacting similar communities. Requiring a programmatic EIS for coal shipments opens up the possibility of requiring such an EIS for all cargoes. This would result in less efficient movement of cargo in general, which means less business investment, fewer jobs, and increased negative economic impacts including a loss of tax revenues for state and local governments. The movement of goods, no matter the commodity being moved, creates the economic basis that stimulates investments in roads, rail, and other basic infrastructure. An overly burdensome environmental analysis creates inefficiencies that jeopardize these investments.

Washington Public Ports Position

Analysis of potential cumulative impacts is a component of the SEPA and NEPA review of all freight infrastructure projects. However, this has never been interpreted to require an analysis that stretches to include the production of the product; its transportation to markets, and its ultimate use. Requiring such an analysis, as part of either a programmatic or project-specific EIS, would be unprecedented and highly detrimental to the development of freight infrastructure and to Washington's trade-based economy. WPPA supports limiting analyses to the potential impacts of the project itself, not the broad overall movement of cargo across a region.

Rail capacity

Opponents of the coal export terminals assert that the resulting increase in freight rail traffic will cause a shortage of capacity for other types of cargo. Our studies indicate that overall freight movement will increase on our rail system, and that near-term our state's rail capacity is adequate, even with the addition of coal trains.

However, there are a number of critical rail improvement projects around the state that are important to support desired growth in our overall trade-dependent economy, whether or not significant increases in the rail transport of coal across Washington occur. These projects need increased investment from railroads, the state, ports and others in order to grow capacity, and meet our forecasts for increased trade in a variety of cargoes.

Washington Public Ports Position

WPPA agrees that rail infrastructure should be improved, where needed, to keep cargo moving efficiently. WPPA supports continued investment by ports, railroads, and agencies such as the Freight Mobility Strategic Investment Board and WSDOT in grade crossing and rail system improvements.

Quality of life in our local communities

Concerns about the disruption of train crossings to local communities are warranted and should be addressed. The length and number of trains will certainly result in longer wait times at at-grade crossings. Significant increased investment in overpasses and other grade-separations, as well as operational changes, will be needed in some communities.

Some groups have raised concerns about coal dust blowing off passing trains. The railroads and shippers must demonstrate to our regulatory agencies how coal dust impacts will be minimized, and kept at levels that are safe for our citizens.

Washington Public Ports Position

WPPA believes that, where feasible and appropriate, railroads should make operational changes and improvements to overpasses and reduce at-grade crossings in order to avoid disruptions in local communities.

Concerns about issues such as coal dust should be studied by environmental regulators. Should impacts be found, they should be addressed and mitigated by the coal shippers and railroads.

For questions contact:

Eric Johnson, Executive Director

Washington Public Ports Association

(360)943-0760 EricJ@washingtonports.org