



MARITIME TRADES DEPARTMENT

AMERICAN FEDERATION OF LABOR and CONGRESS OF INDUSTRIAL ORGANIZATIONS

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EXECUTIVE SECRETARY-TREASURER

AFFILIATES:

Bakery, Confectionery, Tobacco Workers
and Grain Millers International Union
International Brotherhood of Boilermakers,
Iron Ship Builders, Blacksmiths,
Forgers and Helpers
Communications Workers of America
International Brotherhood of Electrical
Workers
International Union of Elevator Constructors
International Union of Operating Engineers
International Association of Fire Fighters
Glass, Molders, Pottery, Plastics and Allied Workers
International Union, AFL-CIO/CIO
International Association of Bridge, Structural,
Ornamental and Reinforcing Iron Workers
International Longshoremen's
Association, AFL-CIO
International Association of Machinists
and Aerospace Workers
Marine Engineers' Beneficial Association
United Mine Workers of America
International Union of Allied, Novelty and
Production Workers, AFL-CIO
Office and Professional Employees
International Union
International Union of Painters and Allied Trades
of the United States and Canada
Operative Plasterers' and Cement Masons'
International Association of the United States
and Canada
United Association of Journeymen and
Apprentices of the Plumbing and
Pipe Fitting Industry of the
United States and Canada
Seafarers International Union of
North America
Sheet Metal Workers International Association
American Federation of State, County
and Municipal Employees
United Steel, Paper and Forestry, Rubber,
Manufacturing, Energy, Allied Industrial &
Service Workers International Union
Transportation - Communications Union, IAM

FAX TRANSMITTAL

Date:

1/17/13

To:

LORI PROVENCE

Organization:

WASH AFL-CIO

Fax #:

206-285-5805

From:

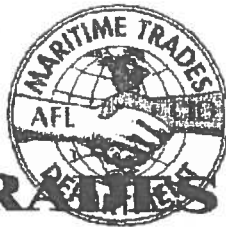
DANIEL DUNCAN

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January 17, 2013

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GPT/BNSF Custer Spur EIS Co-Lead Agencies
c/o CH2M Hill
1100 112th Avenue Northeast, Suite 400
Bellevue, Washington 98004

**RE: Scoping, Gateway Pacific Terminal
Environmental Impact Statement**

Dear Sir:

The Maritime Trades Department, AFL-CIO (MTD) is composed of 23 unions representing more than 5 million members in the United States and Canada. We appreciate this opportunity to submit the following remarks as the co-lead agencies (US Army Corps of Engineers, Washington State Department of Ecology, and Whatcom County) evaluate public comments that will help shape the draft environmental impact statement (EIS) for the Gateway Pacific Terminal (GPT) and Custer Spur expansion projects. We support both projects, which promise to enhance the nation's exports and, more importantly, create the type of decent pay, good benefit jobs needed in this economy.

The public record contains large volumes of unsubstantiated statements by project opponents. Their strategy is clear: to broaden the scope of the EIS and create a degree of complexity in the required analysis so as to guarantee legal appeals that culminate in the projects' failure. For example, the insistence of the opposition to mandate that the co-lead agencies require the use a programmatic EIS is nothing more than an attempt to prevent the project from ever materializing. Every project is subject to a cumulative effects analysis that takes into account the direct and indirect effects on environmental resources in the same geographic areas as the proposed project. However, not only is a programmatic EIS inappropriate, the cumulative effects analysis for the GPT project should recognize that all of the other projects are located at least 200 miles from the GPT site and none of the other projects use the Puget Sound, or use the same air shed as the GPT project. Therefore, none of the local effects, (i.e., the wetlands, habitat, socioeconomic, or transportation) could be cumulative to capture the other proposed projects nor should they.

Washington State and Whatcom County need jobs, our governmental agencies need additional taxes, and—in our view—the projects can and should be permitted, subject naturally to a thorough analysis. In this regard, we would encourage your analysis to take into account the ramifications if these projects do not go forward including, among other things:

RE: Scoping Gateway Pacific Terminal Environmental Impact Statement
January 17, 2013

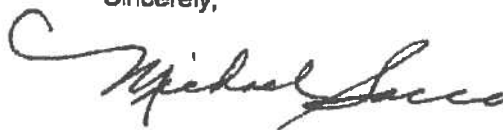
Page 2

- The direct loss of construction and operating jobs associated with the Gateway Pacific Terminal and Custer Spur Expansion projects, including income to Whatcom County;
- The indirect loss of employment and income in Whatcom County and the region from jobs that would have been created to support the new jobs to construct and operate the projects. These indirect jobs would have likely occurred in building materials suppliers, transportation, wholesale/retail goods, housing, public services, etc;
- The overall effect on the local and regional unemployment rate associated with the direct and indirect jobs not created;
- Any loss of local and state business related tax revenue (business and occupation taxes) from business income that would have been created by construction jobs, operation jobs and support employment jobs;
- Any loss of property tax revenue that would have resulted from the increased assessed value of Gateway Pacific Terminal property due to the new facilities constructed at the site; and
- The long term effects of lost opportunity to expand public services (schools, libraries and support for emergency services) supported by project tax revenues and fees.

The Maritime Trades Department, AFL-CIO strongly supports sound environmental practices and the latest technology be used by both projects to protect the communities, the Cherry Point habitat, and surrounding ecosystem. Decent-paying middle-class jobs can and should be created. If your evaluation leads you to a conclusion where the project permits are denied, we hope that you will concur that a thorough response to the important issues identified by the MTD should be made part of your analysis.

Thank you for the opportunity to consider our views on this important undertaking.

Sincerely,



Michael Sacco
President