



San Juan County Council

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District 1, Lovel Pratt
District 2, Rich Peterson
District 3, Howard Rosenfeld

District 4, Richard Fralick
District 5, Patty Miller
District 6, Jamie Stephens

27 November 2012

Proposed Gateway Pacific Terminal/Custer Spur EIS
c/o CH2M HILL
1100 112th Avenue NE, Suite 400
Bellevue, WA 98004

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USACE, Seattle District
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Bellingham, WA 98225-7028

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Alice Kelly, Planner
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RE: Comments on Proposed Gateway Pacific Terminal EIS Scoping

Dear CH2M HILL, Mr. Perry, Mr. Schroeder, and Ms. Kelly,

San Juan County Resolution No. 36-2012, "Regarding Legislative Priorities for the 2013 Legislative Session," includes the following legislative priority:

Secure endorsements from Washington State Representatives and the Governor for the Council's position to oppose the proposed Gateway Pacific Terminal project unless a scoping meeting is held in San Juan County and all project related concerns (including increased vessel traffic and the increased risk of a major oil spill) are considered and addressed in the EIS, and all identified project related impacts are guaranteed to be mitigated.

Thank you for holding the November 3rd, 2012 scoping meeting in Friday Harbor and meeting our first threshold for support of the proposed Gateway Pacific Terminal project. It was very important to us that our constituents had the opportunity to provide their comments at a scoping meeting here in San Juan County.

The following comments identify significant adverse impacts to San Juan County that would only occur if the proposed Gateway Pacific Terminal project is approved. It is our understanding that you must address all of our comments in the EIS by in-depth analysis with reasonable alternatives identified including mitigation measures, and that if any comment is considered not to be significant, you will provide a thorough explanation.

San Juan County's residents and visitors depend upon marine-based public and private transportation. Washington State Ferries are our marine highways. Our air, water, fish, and fowl migrate over long distances on our planet. Thousands of species spend all or part of their life cycle in San Juan County, with 113 Salish Sea species listed as threatened, endangered, of concern, or candidates for listing. Their health directly affects our quality of our life in San Juan County. The impacts from the proposed Gateway Pacific Terminal do not exist in an isolated bubble that can be drawn only around the location of the proposed terminal. A terminal-specific or site-specific EIS will not adequately consider the cumulative impact of the transportation, storage, shipment, and use of coal on the environment and the jobs that directly and indirectly depend upon a healthy Salish Sea ecosystem or upon the health of our citizens and visitors, and the local economy.

San Juan County's economy is inextricably connected to the beauty of its environment and the health of its ecosystems. Many islanders depend upon a healthy and sustainable salmon fishery and Orca population. Jobs are directly tied to commercial and recreational fishing and shellfish farming. The tourist industry is the engine that runs our economy. People come to the San Juan Islands from all over the world to enjoy the beautiful environment and to see birds and sea life.

The transport of coal through Haro and Rosario straits and the Strait of Juan de Fuca, with their narrow channels and strong currents, especially in fog-bound and storm-tossed sea lanes, increases the risk of an oil and/or coal spill. What is the increased risk of an oil and/or coal spill as a result of the increased vessel traffic associated with the proposed Gateway Pacific Terminal project according to the George Washington University's updated Vessel Traffic Risk Assessment? What is the risk of an oil and/or coal spill from a collision, allision, or grounding involving the single-hull bulk carriers? How widespread would the damage be? How many species and commercial and recreational fisheries would be impacted and how would it affect the sustainability of those species? How many local jobs and businesses would be adversely impacted and/or lost? What would be the impacts to property values? What would be the impacts to desalinization systems? What would be the impacts to Washington State Ferries in the event of an oil spill? What would be the costs associated with a spill of a bulk carrier's propulsion fuel? What would be the costs associated with a coal spill? What would be the costs associated with a grounding, allision, or collision involving a bulk carrier that leads to an oil spill from another vessel, including any spills of Alberta Tar Sands products such as diluted bitumen?

San Juan County is the home of and a primary destination for many commercial and recreational fishing vessels and pleasure boats. What would be the impacts, and the associated costs of these impacts, to vessel traffic, including Washington State Ferries traffic, in the waters of San Juan County given the proposed increased bulk carrier traffic? What is the increased risk of an oil and/or coal spill, and what are the associated costs, from a grounding, allision, or collision caused by a bulk carrier and a small vessel such as the November 20, 2012 grounding of a container ship in Prince Rupert Harbour?

The shipment of coal by bulk carrier requires large engine propulsion. What would be the health risks to people and to our waters and marine-dependent species and to our soil, pastures, and locally

produced foods, from the increase in particulate matter from the propulsion fuel used in bulk carrier engines? How would the increased particulate matter impact our residents and visitors who already suffer from conditions such as Chronic Obstructive Pulmonary Disease, asthma, and emphysema? What would be the impacts of the vessel noise on the listed as endangered Southern Resident Orcas and other marine-dependent species, and in particular the vessel noise associated with any required queuing? What would be the impacts of the vessel noise on property values, and in particular the vessel noise associated with any required queuing? What would be the costs associated with the impacts from bulk carrier vessel noise and propulsion fuel particulate matter?

Severe weather could require vessels approaching the proposed Gateway Pacific Terminal for the purpose of transporting coal to discharge ballast water into San Juan County or neighboring waters, thus contaminating the waters of San Juan County. How would ballast from foreign waters containing non-native, invasive aquatic species affect the ecosystem of our waters? Can the impacts from foreign invasive species upon our marine-dependent species be mitigated? What would be the cost of restoration should non-native, invasive aquatic species impact our marine ecosystem?

How will the coal dust, and its constituent parts, associated with the transport, storage, and loading of coal impact the Cherry Point herring and the environment necessary for them to spawn and maintain a sustainable population necessary to feed the marine-dependent species in San Juan County, including the federally listed as endangered Chinook salmon, which, in turn, are the primary food source of the federally listed as endangered Southern Resident Orcas? What would be the costs associated with the restoration of the Cherry Point herring spawning area?

Given San Juan County's proximity to the proposed terminal location and given storm events with significant winds, what amount of coal dust, and its constituent parts, would reach San Juan County from the proposed Gateway Pacific Terminal? What would be the impacts from the terminal's coal dust, and its constituent parts, to human health, crops produced for home and commercial purposes, ground water quality, desalination water quality, and the near-shore marine ecosystem and species? What would be the costs associated with any of these impacts?

The burning of coal releases carbon dioxide into our oceans and contributes to ocean acidification. Based on the tonnage of coal proposed to be exported and subsequently burned, what would be the impacts of increased ocean acidification in the waters of San Juan County? What would be the costs of the increased ocean acidification's impacts on recreational and commercial shellfish? What would be the impacts to the spawning of shellfish for recreational and commercial harvest? What would be the impacts to the wildlife who feed on shellfish? What would be the impacts to the pteropods that comprise much of the diet of juvenile salmon? What would be the costs associated with the increased ocean acidification?

The burning of coal releases carbon dioxide that contributes to global warming. Based on the tonnage of coal proposed to be exported and subsequently burned, what would be the impacts of increased global warming to San Juan County? What would be the costs from associated increased storm winds, ocean surges, and precipitation? What would be the impacts due to sea level rise? What would be the costs associated with sea level rise?

The burning of coal releases mercury. Based on the tonnage of coal proposed to be exported and subsequently burned, what amount of mercury will be released and what amount of that mercury will

increase the mercury content of San Juan County seafood and the people and wildlife that feed upon that seafood? What would be the impacts of the increased mercury pollution? How would the increased mercury pollution impact fish consumption rates? What would be the costs associated with the increased mercury pollution?

We look forward to the draft EIS that addresses all of our comments with in-depth analysis and with reasonable alternatives identified including mitigation measures. Thank you for this opportunity to comment on the scoping for the proposed Gateway Pacific Terminal EIS and to secure the San Juan County Council's standing in the EIS process.

Sincerely,

**COUNTY COUNCIL
SAN JUAN COUNTY, WASHINGTON**

 Lovel Pratt, Member District No. 1	 Richard Peterson, Member District No. 2	 Howard Rosenfeld, Member District No. 3
 Richard Fralick, Member District No. 4	 Patty Miller, Chair District No. 5	 Jamie Stephens, Vice-Chair District No. 6

- Cc. The Honorable Maria Cantwell, US Senator
The Honorable Patty Murray, US Senator
The Honorable Rick Larsen, US Representative
The Honorable Christine Gregoire, Governor of the State of Washington
The Honorable Jay Inslee, Governor-Elect of the State of Washington
The Honorable Kevin Ranker, Washington State Senator
The Honorable Jeff Morris, Washington State Representative
The Honorable Kristine Lytton, Washington State Representative
The Honorable Billy Frank, Chairman, Northwest Indian Fisheries Commission
The Honorable Cliff Cultee, Chair, Lummi Nation
The Honorable Melvin R. Sheldon, Jr., Chair, Tulalip Tribes
The Honorable Brian Cladoosby, Chair, Swinomish Indian Tribal Community
The Honorable Micah McCarty, Chairman, Makah Tribe
The Honorable W. Ron Allen, Chair, Jamestown S'Klallam Tribe
The Honorable Frances Charles, Chair, Lower Elwha Klallam Tribe
The Honorable Robert (Bob) Kelly, Chairman, Nooksack Tribe
The Honorable Jeromy Sullivan, Chair, Port Gamble S'Klallam Tribe
The Honorable Leonard Forsman, Chair, Suquamish Tribe