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January 17, 2013

### Bill Black's Scoping Comments for GPT/Custer Spur EIS

As noted above, my name is Bill Black. I first came to Bellingham/Whatcom County in 1965 to attend Western. Since 1970, when I first became involved in summer-time commercial fishing in Alaska, I've been returning to Bellingham/Whatcom County for the winters. Over the course of these many years I've become deeply rooted in both Bellingham/Whatcom County and the Cordova area of Alaska. What follows is a very brief description of me and just a few of the things which have happened which have shaped my view of the proposed coal port.

It occasionally seems as though I've successfully raised three kids! They're all college graduates and they're all healthy. We all could go for a run together! And we all love each other.

Rose, the Mother of my younger two, my daughters, died here at home in Bellingham from complications of asthma one sunny summer day in 2003.

I'd made my living for 17 years fishing the waters of Prince William Sound, Alaska and the Gulf of Alaska before the reckless grounding of the Exxon Valdez and the subsequent oil spill in 1989. I've been on those black beaches. On the other hand, and much more both usual and positive, I've also seen and been a recipient of tremendous natural abundances which, at times, has exceeded my imagination (and my fish hold!). I'm very sincerely and humbly an Alaskan witness to the abundance the Pacific Ocean and the land can yield if allowed to remain clean. I'm very grateful for what I've been able to take part in and witness.

The following list consists of what I perceive as potential problems and problematic issues with the GPT/Custer Spur project as envisioned and the issues I would like to see studied, considered and weighed prior to launching such a coal project.

1. AIR QUALITY QUESTIONS. There are four segments to this one, all of which, one can safely assume, are going to put significant carbon into our atmosphere. A. The actual mining of the coal. B. The rail transport. C. The ships used to haul all this coal across the Pacific Ocean. D. And last, but not least, the burning of the coal itself.

- A. We've all seen photos of the monstrous machines used to dig up this Powder River coal. Machinery that big does not run on the cheap. How much energy resources (presumably in the form of diesel) are consumed in the mining and loading operation per ton of Powder River coal currently?
- B. Pulling trains loaded with coal as far as is planned and then returning them empty to the coal fields is going to require tremendous amounts of fuel. How much fuel?
- C. Likewise the ship transport of the coal to Asia across the Pacific. Also ship harbor air pollution has been identified as a major culprit in port city air pollution. I'd like to see general coal ship exhaust effects quantified and evaluated.
- D. In my opinion it is likely the most significant pollution, even for us here in the Pacific Northwest (including Alaska) will be the result of the actual burning of the coal in Asia. Is my estimation accurate?

As mentioned previously, my wife who (was the mother of my daughters) died suddenly and unexpectedly of asthma here in Bellingham. There is a certain knowledge gained by families who suffer the pre-mature death of a family member. Are there additional asthma related deaths and individual points of asthma suffering we can anticipate here in Whatcom County as a result of this project? If so, how many?

Ocean acidification is becoming a source of concern for some. Perhaps initially and particularly a source of concern for those who are relying every year, like myself, on a healthy ocean for their living. There have been attempts to quantify the number of people and families here in Whatcom County who do just that either directly (as in fishing or processing), or indirectly as in boat and net building. Keep in mind that we here in Whatcom County are the closest in the Lower 48 to Alaska and it's currently booming fisheries. Suffice it to say that it would be difficult to overstate the value that healthy fisheries constitute for Whatcom County. A lot of that value is seemingly invisible. People, such as myself, just appear or reappear here in Whatcom County with money to spend on property taxes, food, tuition, new cars on Iowa Street, books at bookstores, chair tickets at Baker and/or any of the countless other ways money makes our Whatcom County world go around.

My question here is: Might air pollution resulting from the GPT project, if allowed, conceivably injure fisheries removed from Whatcom County as well as in Whatcom County and thence the money that silently flows into Whatcom County?

And my question here is...Is this Environmental IMPACT Statement going to live up to it's name and consider all the impacts to our environment, including global warming?

2. WATER BORNE POLLUTION. On December 7, 2012 a giant coal ship took out 300 feet of the Westshore coal loading dock which is just a half mile north of the U.S./Canadian border here in Whatcom County. Hours later, when the scene could be photographed, there was still coal drooling into the water from the ends of the dock which remained. There had to have been a lot of loose coal flow into U.S. waters.

There are already three major industrial facilities at Cherry Point, including two of Washington State's five petroleum refineries. When I first saw the photos of the severed and ripped away Westshore dock my thought was...."good thing there wasn't a laden tanker tied up to that dock!"

Half of the herring in Puget Sound and the Straits of Juan de Fuca have historically spawned at Cherry Point. By 2000 the historic amount of herring, or some 15 thousand tons, had been reduced to a little over 1 thousand ton. In response, Washington State proclaimed Cherry Point as an Aquatic Reserve in the hope that the Cherry Point herring, a very basis of the Puget food chain, could survive.

We've learned one thing, for sure, from the Exxon Valdez misadventure. That is that herring are super sensitive to any oil in the water. My question, then, is that given all the uncertainties of water borne shipping how does introducing the number of large coal ships contemplated for such a coal port as GPT not constitute undue risk in light of the proximity of two major petroleum refineries already processing oil and poised to process a whole lot of Arctic oil on into the future? Are we giving up on Puget Sound herring?

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COMMISSIONER'S ORDER

STATE OF WASHINGTON  
DEPARTMENT OF NATURAL RESOURCES  
Jennifer M. Belcher  
Commissioner of Public Lands  
Olympia, Washington 98504

WITHDRAWAL ORDER  
FOR CHERRY POINT  
STATE AQUATIC RESERVE

The State of Washington, being the owner of certain aquatic lands consisting of tidelands and bedlands adjacent to Cherry Point in Whatcom County hereafter described, has found the following:

Cherry Point historically provided spawning habitat for more than 50 percent of the entire herring population of Puget Sound and the Strait of Juan de Fuca; provides a nearshore migratory corridor for Chinook salmon, an endangered species; and provides significant habitat and feeding area of migratory waterfowl populations, and

The herring population at Cherry Point has declined from historical levels of 15,000 tons down to 1,300 tons (less than 9 percent of its historical level) in 1999, and

Scientists have determined that survivability of the species depends on approximately 5,000 tons of spawning adults, and

Preventing further habitat degradation and maintaining Cherry Point's unique habitat is critical to Chinook salmon, already listed under the Endangered Species Act, and critical to preventing further decline and possible listing of Puget Sound herring, and

Cherry Point tidelands and bedlands are a significant environmental resource supporting a unique combination of highly productive habitat for forage fish and substantial diversity and numbers of species, and

Whatcom County recognizes through recent amendments to their Shoreline Master Program and Whatcom County Comprehensive Plan the need to protect this valuable habitat, with amendments limiting the number of piers and establishing a development moratorium along the Cherry Point shoreline, and

Ensuring environmental protection is a management objective for state-owned aquatic lands (RCW 79.90.455(3)), and

Natural values of state-owned aquatic lands as wildlife habitat, natural area preserves, representative ecosystems, or spawning areas are to be considered prior to the Department of Natural Resources issuing any lease or authorizing any changes in use (RCW 79.90.460(3)), and

The Department of Natural Resources may designate reserves on state-owned aquatic lands (RCW 79.68.060 and WAC 332-30-151).

JENNIFER M. BELCHER • Commissioner of Public Lands

# COMMISSIONER'S ORDER

Therefore, the Commissioner of Public Lands being fully advised and believing that the hereafter described tidelands and bedlands are a natural resource of great natural value that should be set aside as an "Environmental Reserve" (WAC 332-30-106(16)) and that this stewardship commitment is a significant initial contribution to the cleanup and recovery of Puget Sound, it is

**ORDERED AND DIRECTED** that the records of the Department of Natural Resources shall note in accordance with provisions of RCW 79.90.460(3) and RCW 79.68.060 that the property hereafter described possesses unique and significant natural values and shall be reserved and withdrawn from conflicting uses for an indefinite term from May 23, 2000, until recovery of Nooksack River salmonid populations and Cherry Point herring populations, and

That public access and other uses of the area described in this Order may be permitted under such conditions and at such times as determined by the Department of Natural Resources.

## LEGAL DESCRIPTION

That portion of the tidelands and bedlands of navigable waters owned by the state of Washington, fronting and abutting Sections 2, 11, 13, 14, and 24, Township 39 North, Range 1 West, Willamette Meridian and fronting and abutting Sections 19, 20, 29 and 32, Township 39 North, Range 1 East, Willamette Meridian described as follows:

Lying south of the south line of government lot 1, of said Section 2, Township 39 North, Range 1 West, W.M. being the south line of Birch Bay State Park; and lying north of the south line of Township 39 North, Range 1 East; and extending waterward to a line which is 70 feet below mean lower low water OR 0.5 mile beyond extreme low tide, whichever line is further waterward;

**EXCEPTING THEREFROM**, the following Use Authorizations issued by the Department of Natural Resources: lease application numbers 20-A09122, 20-A11714, 20-A08488, 20-013265 and 20-010521;

**ALSO EXCEPTING THEREFROM**, any second class tidelands previously sold by the State of Washington.

Situated in Whatcom County, Washington.

Dated this 1st day of August, 2000.

STATE OF WASHINGTON  
DEPARTMENT OF NATURAL RESOURCES

  
**JENNIFER M. BELCHER**  
Commissioner of Public Lands

JENNIFER M. BELCHER • Commissioner of Public Lands

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January 22, 2013

William Black's 1/22/2013 Comments on GPT/Custer Spur EIS  
Impact Issue is Jobs

I've lived in Whatcom County/Bellingham for many years now, 40+, while participating in the Area E salmon fishery of Alaska during the warmer halves of all these years. Area E is that Alaska Department of Fish and Game designated area which includes all the waters between Cape Suckling, on the east towards Yakutat, and Cape Fairfield, on the west towards Seward. Area E, then, includes those waters of and adjacent to the Bering/Copper Rivers and all of Prince William Sound. In a rough sort of way, Area E is comparable to Puget Sound, size-wise.

There are other ways these two areas are comparable both being Great Northwest coastal regions and similarly backed, fed and watered by the greatest snowfall pack on Earth which falls on the coastal mountains from northern California to the Alaska Peninsula put there by the same and great North Pacific Ocean.

Concerning what I understand about the entire GPT project and based upon my many years relying successfully on an estuary very similar to Puget Sound, I'm here to tell you that there is strong evidence that suggests there are many more potential "good jobs" in NOT having the sort of coal port envisioned as opposed to having the 500 ship per year coal port.

That questions, i.e. where actually are the jobs and job potential and whether or not GPT would actually eliminate more jobs and job potential than it would create?.....is what I'd like to see studied.

### Significance

I understand, extremely well, the absolute need for additional meaningful and family supporting jobs in our Whatcom community. Jobs, including sole proprietor businesses, which women and men can perform with a sense of genuine satisfaction and be compensated for fairly and well are crucial to the environment we share. All of us cannot (nor would we all want to be or be capable of to) be Western pros, border guards, real estate agents or computer repair people. There is a very real need for jobs where things are created, grown, made or built. Outdoor jobs one can sink one's teeth into. Jobs like, well frankly, my own.

② 1/22/2013

We, the fisher men and women of Prince William Sound did not make any money for a few years after the grounding of the Exxon Valdez. There were very few returning fish. We, at the time, did not know whether we'd EVER make enough again to stay in business. It was hard. There's been though, except for the herring which have just struggled without much recovery, enormous and amazing recovery of the salmon runs since the spill.

All this has made me very optimistic for Puget Sound....but we've got to do a better job of not harming Puget Sound either chronically or traumatically.

#### Foreseeable

Marine accidents are sadly, to a great degree, inevitable. In spite of whatever we do and wherever the latest in navigation equipment takes us....there will be problems arise. Witness the December 7, 2012 incident just across the Canada/U.S. line at the Westshore coal loading dock. Just how that particular and incredible incident managed to happen is currently beyond me. I'm hoping to enclose photos of that incident for your perusal.

There's been too many cruel mornings in the course of history where the light of day reveals marine horrors from the passed darkness for us to not accept the inevitability of shipping accidents and oftentimes subsequent pollution, sometimes massive pollution.

#### Alternatives

I think that an alternative to GPT would be salmon hatcheries modeled after what has been established in several areas in Alaska, including Southeast, Prince William Sound and Kodiak. There is no reason we could not do it here. The two private, nonprofit, regional aquaculture corporations in Prince William Sound (Prince William Sound Aquaculture Corporation and the Valdez Fishery Development Association) have been returning 250 million dollars (first wholesale price) worth of fish most years. This employs thousands of people in the raising, catching, processing and selling of the beautiful fish which return annually