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January 22, 2013

GPT/BNSF Custer Spur EIS Co-Lead Agencies  
c/o CH2M HILL  
1100 112th Avenue NE, Suite 400  
Bellevue, WA 98004

Re: Proposed Gateway Pacific Terminal /Custer Spur EIS Scoping Comment

Dear Army Corps of Engineers, Department of Ecology and Whatcom County Council:

Thank you for the opportunity to provide scoping comments on the proposed Gateway Pacific Terminal (GPT) coal export facility. As a resident of Bellingham I am an avid kayaker, recreational fisher & crabber, and also utilize the Bellingham waterfront for recreation. I have deep concerns about the impacts of the proposed terminal on human health, aquatic ecosystem and fisheries health and access to the waterfront. Professionally, I work as an attorney with fishermen and tribes throughout Alaska to protect fisheries resources. While the GPT coal facility will be constructed in Washington state, impacts from this facility will include increased shipping traffic as tankers move the coal from Washington to markets in China. This shipping route passes directly through the Aleutian Islands in an area which home to extremely productive fisheries, and many of the fishermen that participate in these fisheries in Area M are Washington residents. This area is also extremely important habitat for millions of salmon as they move between the Bering Sea and Gulf of Alaska, including several stocks of Endangered Species Act-listed salmon.

In the Environmental Impact Statement (EIS) for this particular project I ask that you specifically examine:

- Increases in congestion and noise with more coal train traffic;
- Impacts on property values from increases in congestion and noise with increased train traffic;
- Impacts on planned Bellingham waterfront redevelopment;
- Impacts on recreational use of Bellingham Bay and North Puget Sound, both from limitations on access to the waterfront because of increased train traffic and impacts in the marine environment from increased shipping traffic;
- Impacts on air pollution, both from the trains themselves as well as associated shipping;
- Impacts to aquatic ecosystems and fishing grounds at the terminal site;
- Impacts to aquatic ecosystems and fishing grounds from increased tanker traffic and potential for shipping accidents and oil spills;
- Impacts to human health from coal dust;

- Cumulative impacts to aquatic ecosystems and fishing grounds from climate change, ocean acidification and increased shipping;
- Impacts of increased shipping on Alaska salmon and salmon fisheries (particularly Alaska salmon management area “M”), including both ecological and economic impacts, as increased tanker traffic from Washington to China will involve transiting this area which is important habitat for many stocks and species of salmon as they migrate between the Bering Sea and the Gulf of Alaska;
- Cumulative impacts of increased shipping, climate change, ocean acidification and fishing on Alaska salmon stocks in and around the Aleutians;
- Consult with the National Marine Fisheries Service and Fish and Wildlife Service to conduct §7 consultations under the Endangered Species Act for all listed fish, marine mammals and birds which occur in the terminal site and throughout the range where additional shipping traffic related to the terminal will take place;
- Conduct an area wide EIS to assess the cumulative impact of the five coal export facilities currently proposed that would transport as much as 150 million tons through the Northwest.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Robbins', is placed over a light gray rectangular background.

Rebecca Robbins Gisclair, J.D.