EIS Scoping Comment on Impacts of 974 Annual Vessel Transits for the Proposed Gateway Pacific Terminal (GPT) on Vessel Traffic Safety in the Salish Sea, Rosario Strait, and Strait of Juan de Fuca

My name is Michael Crum. As one who moved to this area for its extraordinary natural beauty and its abundant opportunities for boating in the waters of Birch Bay, the Salish Sea and the waterways of the San Juan Islands, I am deeply concerned with many reasonably foreseeable adverse impacts of the dramatically increased vessel traffic proposed by the GPT.

I completely support and urge through consideration of the following EIS Scoping Comments submitted by Sanford Olson:

1. October 27, 2012 http://www.eisgatewaypacificwa.gov/get-involved/comment/1567
2. January 1, 2013 http://www.eisgatewaypacificwa.gov/get-involved/comment/5696
3. January 5, 2013 http://www.eisgatewaypacificwa.gov/get-involved/comment/6044

In Sanford Olson's EIS comment on January 1, 2013, he states: "After reading other comments, I request that the vessel traffic study also include the probability and consequences of an accumulation of ships associated with the existing terminals, and the GP Terminal, due to delays in product delivery (such as our frequent mudslides closing the rail lines or derailment), mechanical or accidental delays within the terminal complex … as well as weather delays of inbound or outbound ships waiting for more favorable conditions or queuing to load. Please study what bathymetric, geographic, and climatic characteristics would be required to determine where safe anchorages could be located for these deep draft vessels during a disruption of product shipment or shipping schedules due to reasonably foreseeable causes."

On December 7, 2012, the bulk-cargo carrier, *Cape Apricot,* crashed through the Westshore Terminal dock trestle, at Roberts Banks, B.C., causing 30 (or more) tons of coal to be spilled into the Strait of Georgia. The resulting interruption of coal shipments from the Westshore Terminal has resulted in "a freighter parking lot," according to an article by Sandra McCulloch that appeared January 15, 2013 in the *Times Colonist*: http://www.timescolonist.com/news/local/coal-ship-backlog-clutters-cowichan-bay-1.48479 The article begins: "The paradise of Cowichan Bay has been turned into a freighter parking lot, forcing residents to deal with the clatter of dropping anchor chains, rumbling generators and the glare of floodlights that illuminate the vessels at night. Many of the vessels are in the queue to load coal at Westshore Terminals, near Tsawwassen, which cut back operations after a Dec. 7 incident when a freighter rammed into a trestle leading to one of the two deep-sea berths."

Bays and waterways within the San Juan Islands are not suitable moorage locations for deep-draft, Panamax and Capesize bulk-cargo vessels. The only designated General Anchorage, 110.230, just west of Neptune Beach, (NOAA Chart #18421) occupies approximately one half of the distance between the Cherry Point shoreline and the Alden Bank. Even with anchor rode scopes of as little as 3:1 or 5:1, the anchored swing diameters for Panamax and/or Capesize vessels would significantly reduce the available deep-water, surface areas necessary for the safe passage of oil tankers approaching and/or departing the BP Cherry Point Refinery docks … resulting in reasonably foreseeable adverse impacts upon vessel safety. Anchored vessels, waiting for moorage at the proposed GPT wharf, would pose a hazard and probable risk of vessel collision, due to inadequate water depths and distance for safe passage.

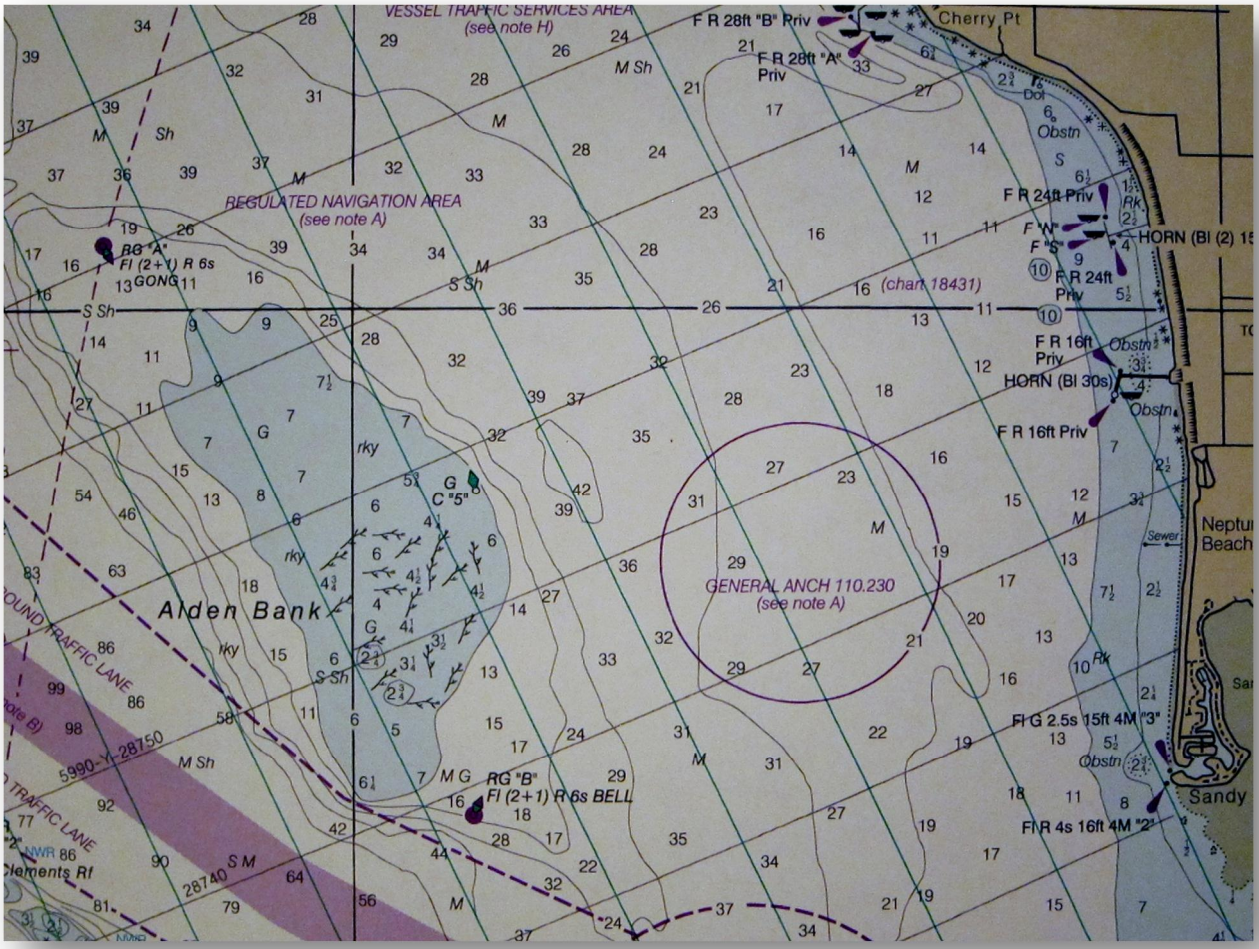

Figure 1 (above) shows a portion of NOAA Chart # 18421 that reveals the "GENERAL ANCH 110.230" occupies approximately one-half of the deep water distance between Alden Bank (to the west) and the relatively shallow waters along the Neptune Beach shoreline (to the east).

I ask that you address each of Sanford Olson's requests in his three aforementioned EIS Scoping Comments. Additionally, I ask that the following be included and be systematically analyzed within the scope of the EIS:

- Impacts of proceeding any further with Pacific International Terminals' application for the proposed GPT without the applicant's completion and full compliance with all requirements of the 1999 Settlement Agreement. Specifically, Tidal Current Study (2.10e), Vessel Traffic Analysis (2.10a), Vessel Mooring Study and Plan (2.11), Spill Prevention, Preparedness, and Response Plans (2.9a)

- Impacts of adding 974 annual transits of Capesize and Panamax bulk-cargo vessels, serving the proposed GPT wharf, to the current annual transits of oil-tanker vessels, serving BP Cherry Point Refinery, on health and safety of employees at both facilities.
- Impacts of 974 additional annual transits of Capesize and Panamax bulk-cargo vessels to the current annual transits of oil-tanker vessels, at BP Cherry Point Refinery, on risk of marine vessel accidents and oil spills or outflows resulting from collisions between two vessels, groundings (both powered and drift), and collisions (collisions with the dock or other fixed objects).
- Impacts of 974 additional annual transits of Capesize and Panamax bulk-cargo vessels to the current 850 annual oil-tanker and bulk-cargo vessels, serving the Cherry Point shoreline, on risk of marine vessel accidents and oil spills or outflows resulting from collisions between two vessels, groundings (both powered and drift), and collisions (collisions with the dock or other fixed objects).
- Impacts of 974 additional annual transits of Capesize and Panamax bulk-cargo vessels to the current number of commercial and private vessel transits, in the Rosario Strait, on risk of marine vessel accidents and oil spills or outflows resulting from collisions between two vessels and/or groundings (both powered and drift).