



League of Women Voters of the San Juans
Box 784
Friday Harbor, WA 98250
January 14, 2013

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

Re: Comments regarding proposed Gateway Pacific Terminal EIS

Dear CH2M HILL,

The League of Women Voters of the San Juans, an organization of over 50 residents of San Juan County, wishes to express its concerns about the environmental and human health effects of the proposed Gateway Pacific Terminal project and the many coal shipments it would generate through the waters of the Salish Sea. Our comments relate to the impacts of this project on the well-being of the waters surrounding our archipelago within the Salish Sea and of the residents -- human and other species -- of those waters and islands.

Our comments are underlain and supported by the adopted Legislative Priorities of the State of Washington League of Women Voters. One of our 2013 priorities is to “consider environmental quality and public health impacts when making decisions about transportation and exports.”

First and foremost, we would like to note that the impacts of the proposed coal terminal at Cherry Point do not just exist within a few miles of the Cherry Point site. The impacts will be visited on the people of the Salish Sea which includes the San Juan Archipelago. The impact of increased numbers of vessels in our local waters has the potential to do irreversible harm to the fragile marine ecosystem and the health and livelihoods of the people that inhabit these islands. Therefore, we ask that you assess the impact of increased vessel traffic, the increased potential for spills, the ensuing ecologic damage and the effect on human health and wellbeing in the San Juan Archipelago.

The economic health of our county depends upon protection of the pristine quality of our waters and the sustainability of the population of marine creatures. We rely upon tourism; and tourism relies upon the scenic beauty here and our healthy ecosystems which include the resident birds, fish and marine mammals. As you assess the environmental risks and impacts of this project, please carefully analyze the risk of collisions or groundings of the single hulled bulk carriers maneuvering through the narrow passages of the San Juans especially considering that storms and poor visibility are commonplace here. Please assess the risk of release of coal and propulsion fuel from single hulled ships. Should a hull breach release propulsion fuel or coal, the whole marine food web would be at risk. Mercury, cadmium, lead and chromium are among the heavy metals associated with coal. What steps would be taken to mitigate contamination of our marine food web or impact human health with toxic byproducts in the event of a spill? Also, much

research has been done regarding the impact of the noise of shipping on our resident Orca whales; please pay attention to this.

The dumping of ballast water from ships from foreign ports is permissible if bad weather threatens shipping safety. Ballast water often contains non-native aquatic species. These invasive species may cause harm to fish and shell fish consumed by humans and marine dependent creatures. The fishing and shellfish industries are at risk from invasive species. The potential release of invasive species increases as the number of foreign ships increase. Please study the impact of invasive species on our region's marine ecosystems including the economic impact to the associated industries.

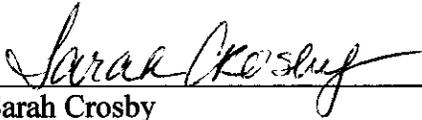
Bulk carriers emit harmful particulate resulting from burning propulsion fuel. Please evaluate the impact of exhaust particulate on our residents and visitors with chronic pulmonary disease, the impact on our marine dependent species and on our soil, pastures and food crops. Please note that in cases of high winds blowing from the direction of Cherry Point, coal particulate could also be deposited in the waters and on the soils of the San Juan Islands. The impact on human health and the environment from this type of particulate should also be considered.

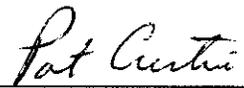
Waters of the San Juan Islands are on the verge of being declared a National Conservation Area and it would be a travesty to put them at the additional risk posed by hundreds of transits of super-sized, single hulled coal transport ships.

Our County Council has submitted a detailed comment letter on the Gateway Pacific Project which we have publicly endorsed. We urge you to pay close attention to the points it raises. A copy of the San Juan County Council letter is enclosed for your convenience.

Thank you for considering our concerns.

Board of Directors, League of Women Voters of the San Juans


Sarah Crosby

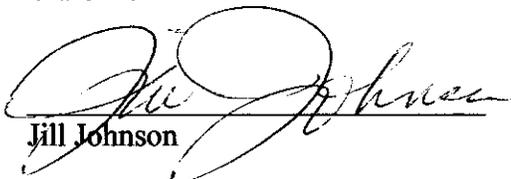

Pat Curtin

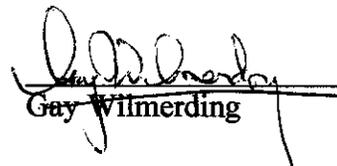

Susan Dehlendorf

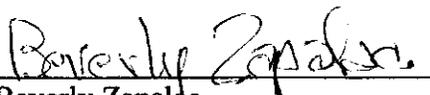

Margie Doyle


Clare Kelm

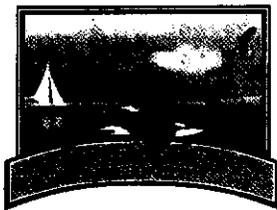

Ann Jarrell


Jill Johnson


Gay Wilmerding


Beverly Zapalac

cc: San Juan County Council, Friday Harbor, Washington 98250, email: council@sanjuanco.com



San Juan County Council

350 Court Street No. 1
Friday Harbor, WA 98250
(360) 378 - 2898

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

Randel Perry, Project Manager
USACE, Seattle District
1440 10th Street
Suite 102
Bellingham, WA 98225-7028

Tyler Schroeder, Planning Supervisor
Whatcom County, Planning & Development Services
5280 Northwest Drive
Bellingham, WA 98226

Alice Kelly, Planner
WA Department of Ecology, NWRO
3190 160th Ave SE
Bellevue, WA 98008-5452

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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 wide-spread 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?

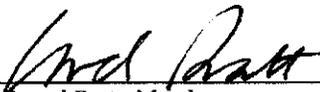
The burning of coal releases mercury. Based on the tonnage of coal proposed to be exported and subsequently burned, what amount of mercury will be released and what amount of that mercury will

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?

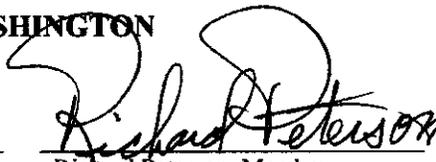
We look forward to the draft EIS that addresses all of our comments with in-depth analysis and with reasonable alternatives identified including mitigation measures. Thank you for this opportunity to comment on the scoping for the proposed Gateway Pacific Terminal EIS and to secure the San Juan County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

Sincerely,

**COUNTY COUNCIL
SAN JUAN COUNTY, WASHINGTON**



Lovel Pratt, Member
District No. 1



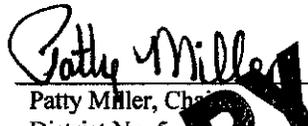
Richard Peterson, Member
District No. 2



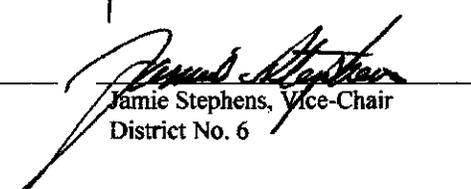
Howard Rosenfeld, Member
District No. 3



Richard Fralick, Member
District No. 4



Patty Miller, Chair
District No. 5



Jamie Stephens, Vice-Chair
District No. 6

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- 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