

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

Dear EIS Co-lead agencies:

Hello, I Richard Blanc am a commercial fisherman for the last 45 years and I have lived in Washington near Puget Sound for 47 years.

SSA Marine cannot be trusted to follow through with EIS mitigation requirements.

Their permit to go forward with this project must not be issued until they have complied with a herring assessment that they agreed to do 13 years ago and haven't even started.

The agreement calls for a two-year acoustical-trawl measurement of spawning herring. [Researchers use a sonic fish finder to determine the number and size of fish, and bring up netted fish at the same time to learn what species they're seeing on the sonar.] Those would provide a baseline for measuring changes in the future.

"It should be gathered as close as possible to the actual construction time frame, and SSA Marine remains committed to doing that." But hasn't done it for 13 years.

That's only one of the many pieces of saltwater research the company's required to do, under terms of the settlement agreement. The complete list is pages long; the studies are not known by neat, short titles. A short, partial list would include:

Placing caged mussels in the water column to see what toxins the mussels are taking in.

Identifying the route herring follow from the deep waters offshore, into the spawning areas.

Learning the herring's sensitivity to light and noise.

Studying the response of herring embryo to toxins likely to be present in shipping and other industrial settings.

"SSA agreed to the studies, and those are part of what goes into the Whatcom County Shoreline Development Permit," Everett said. "If they don't do the studies, they don't get the project.

This whole EIS scoping period and the preliminary EIS should stopped until SSA Marine fulfills their agreed upon 2 year herring studies. And proceed only after the results have been assessed that show heavy industry (2 oil refineries and an aluminum plant with creosote pilings and docks have not caused the collapse of the herring stocks off of Cherry Point.

Thank you for your consideration,

Richard Blanc

