

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.

I agree with Professor Michael Riordan (riordan CherryPointWinds.pdf, <http://www.eisgatewaypacificwa.gov/sites/default/files/comment-attachments/pdf/riordan%20CherryPointWinds.pdf>) that the EIS measure wind speeds and direction at the site, model how often wind gusts will create fugitive dust storms, and design mitigations to eliminate fugitive dust reaching the fragile aquatic environment.

Based on the EPA's AP-42 standard formula, and assuming an average wind speed of about 10 mph, one can roughly estimate that the fugitive coal dust emissions from the proposed Gateway Pacific Terminal would be at least 1,000 tons per year

The accumulations of coal on the sea floor that will occur can be reliably estimated by again considering the Westshore example. Around this terminal, sea-floor deposits of coal dust have been measured in detail.

If Gateway Pacific Terminal proposers cannot confidently assure Whatcom County planners and the WA Department of Ecology that unacceptable releases of fugitive coal dust will definitely not occur from open storage piles, then a covered coal-storage facility is the only possible option remaining, short of abandoning plans to build the terminal.

A 100,000 tons of fugitive coal-dust blown into Puget Sound and the surrounding area is unacceptable. This situation needs to be mitigated or the permit denied.

Thank you for your consideration,

Richard Blanc

