

My name is Donald Stillman. I first came to Orcas Island in 1956 as a boy when my Uncle Joel, a preacher, held several weekend tent revival meetings there. I remembered little of his fire-and-brimstone sermons, but never forgot the heavenly beauty of the San Juan Islands. Now, I live between Doe Bay and Olga, right on Rosario Strait where I will have an excellent view of the 950 or so Cape-sized coal tankers that will traverse these waters each year if the Gateway Pacific Terminal ultimately is operational. My wife and I and our children have spent thousands of hours on the beaches of Orcas Island, most recently two weeks ago.

I plan to file several comments. This one concerns the issue of possible introduction of invasive species into the Salish Sea, including the waters around the San Juan's. I urge that you scope the range of issues involved in the likelihood of the coal tankers discharging ballast water into the Salish Sea that contains invasive species.

Lori Williams of the National Invasive Species Council (created by Presidential executive order and co-chaired by the Secretaries of Commerce, Agriculture, and Interior) estimates that invasive species cost the U.S. \$100 billion in damages each year. The United Nations has identified the introduction of invasive marine species into new environments by ships' ballast water as one of the four greatest threats to the world's oceans.

The huge coal tankers that will transit the San Juan Islands where I live are likely to each carry between 6 million and 10 million gallons of ballast water taken on in waters near China. That would result in up to 4.5 trillion gallons of ballast being discharged by the coal ships every year. That water is likely to contain large numbers of aquatic species and microbes that could have an adverse impact, if and when coal tanker ballast is discharged into the Salish Sea--whether due to hostile weather, mistakes, or failure to follow guidelines and rules on ballast charge.

The huge expansion of coal tanker traffic brought about by approval of the Gateway Pacific Terminal clearly would have a probable significant adverse impact on the Salish Sea through introduction of invasive species. Those effects would be direct, indirect, and cumulative and might occur across a broad part of the Pacific Northwest waters, including Whatcom County and San Juan County. The negative effects of these invasive species in the future are reasonably foreseeable, not merely speculative.

Certainly the proponents of building the Gateway Pacific Terminal will argue that ballast water discharge can be done safely, thus mitigating this problem. It should be noted that the BNSF railroad, Peabody Energy, SSA Marine, and other companies advocating this project and offering reassurances about its safety are not in a position to commit to proper and safe ballast water discharge. Only the shipping companies involved can make such claims and the reality is they cannot guarantee, for example, that a violent storm in Rosario Strait would not result in ballast water being discharged there if a Captain believed it necessary to save the ship.

Reportedly, there are only two full-time Fish and Wildlife inspectors to monitor thousands of ship transits currently (Barry Mason comment 6868 quoting Crosscut, December 12, 2012). The scoping should examine the extent to which realistic regulatory oversight can prevent the introduction of invasive species due to this expanded coal traffic.

This scoping also should examine the economic impact of invasive species likely to be imported on the coal tankers. There are ample precedents. Green crabs, an invasive species introduced into the bay area of San Francisco, devastated fisheries there. Zebra mussels introduced by ship traffic in the Great Lakes have caused huge environmental and economic devastation. Asian carp have severely harmed native fish in the Mississippi River. Advocates of the terminal need to respond to detailed scientific studies on the possibility of similar impacts in the waters of Washington State, including the Salish Sea and the Columbia River. It would be important to look at the potential job losses from the negative effects of coal tanker ballast introducing invasive species into our waters. My state's economy benefits from the fishing and crabbing industries that employ substantial numbers of workers who could be jeopardized if salmon or crab are harmed by new invasive species brought in by the coal ships.

This scoping should also include examination of the invasive species that will be brought into the San Juan's and the entire Puget Sound by the coal tankers through attaching themselves to the hulls of the ships. I'd also urge scoping of the possible impact of insects that the coal tankers could introduce to Washington State as they traverse our waters and dock at Cherry Point. I am particularly concerned about insects introduced by the coal ships that might adversely affect Douglas Fir and other native tree species native to the Pacific Northwest. The U.S. Forest Service reports that non-native, wood-boring insects such as the emerald ash borer and the Asian long-horned beetle are costing an estimated \$1.7 billion in local government expenditures and about \$830 million in lost residential property values every year. With coal tankers arriving every day at the Gateway terminal, it seems entirely possible that insects from Asia that threaten Washington forests might be introduced to our shores.

On January 17, 2013, NBC News carried a report about the large number of invasive species found on a 66-foot dock that had washed up on the Washington coast as a result of the tragic tsunami/earthquake in Japan months earlier. As more debris from the Japanese tsunami enters Pacific Northwest waters, it would be useful to scope the impact of the cumulative impact and synergies arising out of not only the new coal traffic in and out of Gateway, but also all of the other possible ship traffic carrying energy materials coming out of other current and proposed terminals in the Northwest and British Columbia.

Thank you for considering my proposals.

