



Whatcom Marine Mammal Stranding Network

www.wmmsn.org

Department of Ecology
Whatcom County Council
Army Corps of Engineers

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RE: GPT/Custer Spur EIS

To whom it may concern,

The Whatcom Marine Mammal Stranding Network (WMMSN) is a non-profit corporation made up of volunteers authorized by NOAA to conduct investigations and determine causes of marine mammal strandings, to rehabilitate some marine mammals, and to provide educational tools for the public about marine mammals found on our shores locally in Whatcom County and on surrounding islands. Our website, www.wmmsn.org, has more details on what we are about and who is involved.

We are very concerned about the Gateway Pacific Terminal proposed by SSA Marine. We wish to address several key impacts on marine mammal and wildlife populations in the Samish Sea in addition to some background statements that support our position.

- **Risk of Spill:** Tens of thousands of marine vessels transit the Strait of Georgia every year, including those destined for the piers of the Alcoa Aluminum smelter, BP and Conoco-Phillips refineries at Cherry Point. Vessel traffic is growing due to a rise in exports and plans for an additional oil pipeline from Canada. The transport of 54 million metric tons per annum (Mtpa) of cargo, 48 Mtpa of which would be coal, from the proposed terminal at Cherry Point, would require the addition of over 900 annual transits (over 450 ships, coming and going) by some of the largest oceangoing vessels. The Strait of Georgia is one of the busiest shipping lanes in the world and is getting busier with recent increases in the region's marine exports. In addition, the number of oil tankers traveling from Canada through the Strait of Georgia has increased dramatically due to an increased volume of oil exports. Moreover, the number of oil tankers and the volume of oil exports in the Strait are expected to grow unprecedentedly high with North America's Kinder Morgan energy company's plans to proceed with a major oil pipeline expansion linking Alberta tar sands oil to Vancouver's Westridge terminal. Despite the increase in vessel traffic, Washington's oil response spill program is facing budget cuts. Given the size of vessel involved, a spill of coal and/or oil would be devastating to the marine life in the Samish Sea. This includes prey species such as herring that salmon use for their survival, and in turn, affect marine mammal populations of species such as the endangered killer whale which depend on salmon for survival. All of these direct and indirect effects as well as the cumulative effects of shipping throughout the entire Salish Sea need to be addressed as to their impacts on marine mammals that use this area for breeding, feeding and migration.
- **Collision Risk:** A review of the environmental and safety documents for the initial (1997)

proposed Gateway Pacific Terminal, shows that the proposed increase in vessels would result in an increase in approximately 60% in the deep draft ship traffic in the upper Rosario Strait, the route most vessels from the terminal would likely take. The review also found that the increase in proposed deep draft traffic on the risk of collisions and powered vessel groundings in Rosario Strait was not adequately addressed by the 1997 Vessel Traffic Study. Collision frequency is highly dependent upon traffic density and environmental conditions. Vessels most likely to be involved in a collision with a large bulk cargo vessel are: passenger ferries, tank barges, and tank vessels—the impact of which any one would be catastrophic. Powered or drift groundings of large bulk carriers are also a serious risk given that they carry thousands of tons of bunkers in single bottom tanks and they are not escorted by tugs. Marine traffic delays and backups in Rosario Strait will also likely occur given that it is a one-way zone for deep draft vessels.

- **Airborne pollution at Cherry Point:** Marine vessels account for the largest single source of sulfur dioxide in the airshed in the larger Georgia Basin (where the Cherry Point Aquatic Reserve is located). Eighty-100 acres of open coal heaps will be in proximity to beaches used as haul-out sites for breeding and resting marine mammals. This area is sometimes subjected to high winds; it is unknown to what extent coal dust in the water might affect the marine plants and animals, although it is suspected that increases in air pollution around the proposed terminal will cause health problems for these marine mammals in the form of respiratory infections that made lead to other serious illness and potentially death. Impacts to beaches and haul-out sites and the effects of coal pollution on wildlife associated with these areas needs to be addressed, direct and indirect as well as cumulative. Unmitigatable impacts need to be clearly displayed as well as violations of the endangered species act.
- **Cherry point aquatic reserve:** Washington herring are a keystone species, as they provide food for a number of other species. This unique spawning schedule and location makes the Cherry Point herring a vital source of food for the endangered Chinook salmon. The Chinook salmon, in turn, provide sustenance for orca/killer whales, porpoises and other marine mammals. Because Cherry Point herring spawn in open, high energy shoreline areas, vessels in transit to and from the proposed Terminal could cross through their prespawning holding areas and disrupt their spawning habits. According to Washington Fish and Wildlife, conservation of herring spawning habitat and minimizing disturbance in the prespawning holding areas are key to preservation of the herring stock inside Puget Sound. Additionally, shading from the proposed Terminal's wharf and trestle could further decrease the herring population by causing a decline in herring spawning habitat and primary productivity due to reduction of macroalgae. Coal dust, which is notoriously difficult to control, blowing or running into the water from the proposed Terminal's uncovered 80-acre coal storage area could further shade critical macroalgae or seagrass species and deplete critical oxygen in nearshore habitats. Many fish, mammals, and aquatic birds are dependent upon herring, including: Pacific Cod, Lingcod, halibut, Chinook salmon, harbor seals, herons, western grebes, common murre, rhinoceros auklets, tufted puffins, orcas, seals, sea lions, Dall's porpoises and surf scoters. Marine mammals that may use the Reserve's waters include: Dall's porpoise, Steller and California sea

lions, gray whales, harbor seals, Southern Resident Killer Whales, humpback whales, seals, and Pacific harbor porpoise. Disruption of this fragile ecosystem could have devastating effects to all populations of marine mammals as well as other wildlife that are found in the Salish Sea. Impacts to estuaries and the effects of coal pollution on wildlife associated with this aquatic reserve needs to be addressed, direct and indirect as well as cumulative. Unmitigatable impacts need to be clearly displayed as well as violations of the endangered species act.

- **Estuaries and beaches:** Anadromous fish are those that are born in fresh water, live their lives in salt water, and then return to fresh water to spawn. Salmon and smelt are examples. The importance of estuaries for the health of the marine ecosystem and marine life cannot be overstated; a healthy estuarial system is critical to the survival of certain species, which can have a chain reaction to other dependent species, and ultimately the top of the food chain predators such as orcas. Removal of beach habitat for construction of the additional terminal will have a permanent reduction in haul-out sites that pinnipeds use for breeding and resting. Additional pollution can result from ballast water exchange, water quality deterioration from construction and operation of the facility, vessel traffic impacts, and questions surrounding how many additional piers will be allowed. Impacts to estuaries and beaches and the effects of habitat reduction on wildlife associated with these estuaries needs to be addressed, direct and indirect as well as cumulative. Unmitigatable impacts need to be clearly displayed as well as violations of the endangered species act.
- **Economic loss of investment:** The federal government, the Puget Sound Partnership, and the state DNR have invested millions of dollars in working to restore marine ecologies that may now be jeopardized by the substantial increase in ship traffic, pollution and wetland disturbance associated with the proposed coal port site. Economic impacts of invested taxpayers dollars to restore these ecosystems that will likely be lost due to destruction of these same ecosystem needs to be addressed both in terms of direct, indirect and cumulative effects of loss of money.
- **Collision of mammals with vessels:** Marine mammals in and around the waters at the proposed Terminal may be injured or killed by collision with the high number of increased vessels proposed by this project. Direct, indirect and cumulative effects of these impacts will need to be addressed. Unmitigatable impacts need to be clearly displayed as well as violations of the endangered species act.
- **Noise pollution:** The additional noise created by the increase in vessel traffic can cause disruptions to feeding, breeding, and migration patterns utilized by all marine mammals throughout the Salish Sea. Direct, indirect, cumulative and unmitigatable effects of the additional noise on wildlife populations, especially all cetaceans, including killer whales, needs to be clearly addressed. Violations of the endangered species act need to be clearly stated.
- **Airborne pollutants throughout Salish Sea:** The increase in the contaminants caused by coal dust as it circulates throughout the marine environment can cause serious health risks in form of

respiratory infections among others, for all marine mammal populations found in the Salish Sea, including the endangered killer whale. Direct, indirect, cumulative and unmitigatable effects of the increase in contaminants on wildlife populations, especially killer whales, needs to be clearly addressed.

- Disturbance by marine traffic from noise and vessel movement, reduction of food (Chinook salmon, herring, cod), and high levels of environmental contaminants are the three main factors causing the decline of threatened Northern Resident and endangered Southern Resident Killer Whales. Violations of unmitigatable impacts to endangered species needs to clearly addressed.

The effects of air and noise pollution, as well as vessel collisions and habitat removal at the site of the terminal and reduction in food sources all aid in potentially decreasing marine mammal populations. The effects of these types of impacts needs to be studied to better understand the losses that could be incurred by the completion of this terminal. A biological assessment should include all these issues. Most, if not all, of the above issues cannot be mitigated and therefore would provide unacceptable risks to marine mammal populations throughout the Salish Sea in the foreseeable future.

We thank you on the opportunity to comment on this proposal. We wish to be kept informed on any upcoming actions that be required as part of this project.

Thank you for your consideration,

/s/

Mariann Carrasco

Principle Investigator

Whatcom Marine Mammal Stranding Network