



San Juan Marine Resources Committee
135 Rhone Street, P.O. Box 947
Friday Harbor WA 98250



October 30, 2012

Alice Kelly, Northwest Regional Office, Department of Ecology

Randel Perry, U.S. Army Corps of Engineers, Regulatory Branch

Tyler Schroeder, Planning and Development Services, Whatcom County

Re: Proposed Gateway Pacific Terminal EIS Scoping

Dear Ms. Kelly, Mr. Perry, and Mr. Schroeder:

The San Juan County Marine Resources Committee (MRC) serves as an advisory committee to the San Juan County Council on marine science and policy issues, identifies priorities and implements projects for local marine resource protection, conducts scientific and data gathering projects to inform local marine resource management, and engages the community to build greater stewardship of the local marine environment. The San Juan County Marine Resources Committee also serves as the Citizens Advisory Group for implementation of the San Juan Chapter of the federally approved Puget Sound Chinook Recovery Plan. We are highly concerned with the risks associated with the proposed Gateway Pacific Terminal and the impacts these pose to the San Juan Islands community. To address our concerns, we respectfully request that the co-lead agencies, in compliance with NEPA and SEPA, include in the Environmental Impact Statement (EIS), the topics and analyses identified below.

All potential impacts from the proposed increased shipping traffic and transport of coal through the marine waters surrounding San Juan County should be analyzed and evaluated, including impacts to water quality, air quality, critical habitat, aquatic resources, endangered species as well as public health and impacts to our environment and tourism-based economy, including recreational and commercial boating, wildlife viewing and fisheries. Questions we need answers to before this project is considered include:

- How might the increased vessel traffic impact the foraging behavior of the federally listed endangered Southern Resident killer whales?
- What impacts could the terminal and localized impacts have on the spring-spawning Cherry Point herring stock and the associated food web, including federally listed Chinook salmon and killer whales?
- San Juan County will be profoundly affected by climate change, both due to sea level rise and changing and unpredictable weather patterns. What role will the additional burning of North American coal in Asia play in affecting the climate change impacts to the marine environment?
- What is the increased risk of collision and subsequent oil spills from over 900 additional large vessel transits through our waters?

In addition to these questions, we request that the following topic areas of concern be addressed and analyses be completed as part of the EIS to assess and evaluate these concerns.

Topic areas of concern:

- Vessel traffic
 - Increased risk of oil spills and impact to marine environment (wildlife and vegetation), human health, and local economy
 - Increased noise disturbance and impact to marine mammals (i.e. killer whales)
 - Increased local air pollution and impact to human health
 - Impact to marine environment (wildlife and vegetation) from coal spills
 - Decrease in water quality due to increased toxics in the environment (including air emissions, coal dust, and oil spills)
- Industrial site
 - Increased risk of oil spills and impact to marine environment (especially Cherry Point herring stock)
- Air pollution from burning of coal
 - Climate change impacts
 - Human health impacts

Analyses needed to assess and evaluate concerns:

- Conduct risk analysis including possible volume and trajectories of oil spills, season, and geographic location, including proximity to local communities and highly valued fish, bird, and marine mammal habitats.
- Conduct economic analyses of loss of tourism dollars and local jobs in San Juan County in the event of a major oil spill.
- Conduct environmental assessment of potential impacts in the Salish Sea.
 - Evaluate existing pre-spill strategies for resource protection and identify additional protection options for resources at risk.
 - Conduct chemical analysis of current water quality throughout San Juan County.
 - Establish baseline of all species present and current population size.
 - Conduct risk analysis and identify potential ecological impacts, including impacts to all listed species and associated food webs, from medium and large vessel fuel spills, coal dust, and vessel air emissions.
 - Identify potential impacts from all oil spill response techniques (i.e. dispersants).
 - Identify quantity of air pollution from burning of all coal anticipated to be transported and conduct risk analysis of consequent human health impacts.
 - Identify climate change impacts from burning of all coal anticipated to be transported, including quantification of anticipated sea level rise and assessment of impacts from ocean acidification and ocean temperature increase.
 - Identify local human health impacts from additional local air pollution from increased tanker traffic.
- Analyze oil spill response capacity throughout the Salish Sea.
 - Identify local resources available and resource gaps to respond to an oil spill within a 4-hour period.
- Provide plan for recovery and restoration following an oil spill.

Our mission is to protect and restore the marine waters, habitats and species of the Salish Sea to achieve ecosystem health and sustainable resource use.

Why this matters:

The entirety of San Juan County is a marine biological preserve established in the 1920s and codified in RCW 28B.20.320 to protect the unique and diverse community of marine plants and animals that live only here. The flora and fauna of this region are exceptionally rich and representative of nearly all major groups of marine algae and invertebrates. The shorelines of San Juan County are designated as Shorelines of Statewide Significance and critical habitat for federally listed threatened Chinook salmon and endangered Southern Resident killer whales. Increased shipping traffic and a major oil spill in this region could have significant impacts on these species, as well as the San Juan community.

A major oil spill has the potential to decimate the Southern Resident killer whale population. In addition, the County's shorelines provide important outmigrating habitat for juvenile salmon, including Chinook, coho, pink and chum from multiple Puget Sound, Fraser River and Vancouver Island stocks. Local food webs support multiple species of ecological, cultural and economic importance in the region, such as Puget Sound Chinook, rockfish, the southern resident killer whale, and seabirds such as the marbled murrelet. This complexity and extent of marine shoreline, as well as the regional food web support they provide is unique and potential impacts to this ecosystem, and the human communities it supports, must be thoroughly analyzed and evaluated in the Gateway Pacific Terminal area-wide Environmental Impact Statement.

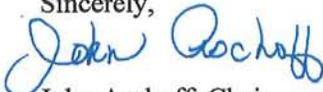
The San Juan Archipelago is characterized by complex geography and geology, with over 400 miles of marine shorelines across hundreds of large and small islands. While predominantly rocky, the county's shorelines also support significant "soft" geomorphic shoreforms, including 90 miles of net shore drift cell systems (feeder bluffs, transport zones and accretion beaches), 48 miles of pocket beaches and nearly 20 miles of embayment estuaries and lagoons. The attached oiling residence time map for San Juan County, based on data from the Washington Department of Natural Resources ShoreZone Mapping (2001) illustrates the immense challenges our complex geography poses to oil spill prevention and recovery efforts, with over half of our shorelines (215 miles) designated as high residence times.

As detailed in the Puget Sound Partnership's Action Agenda and the Marine Stewardship Plan for San Juan County, major oil spills are ranked as the top threat to marine ecosystems and major oil spill prevention is identified as a top priority. As this project would significantly increase vessel traffic and thus the probability of a major spill, it is in direct conflict with our local and regional management plans based on state and federal regulations.

The San Juan County MRC requests that the scope of the Environmental Impact Statement recognize the increased risk to the environment throughout the shipping routes as well as the port at Cherry Point, Washington. We ask that the Environmental Impact Statement fully and completely include the connected and cumulative actions, issues and concerns of the marine and human communities of San Juan County, as listed above.

Thank you for your consideration.

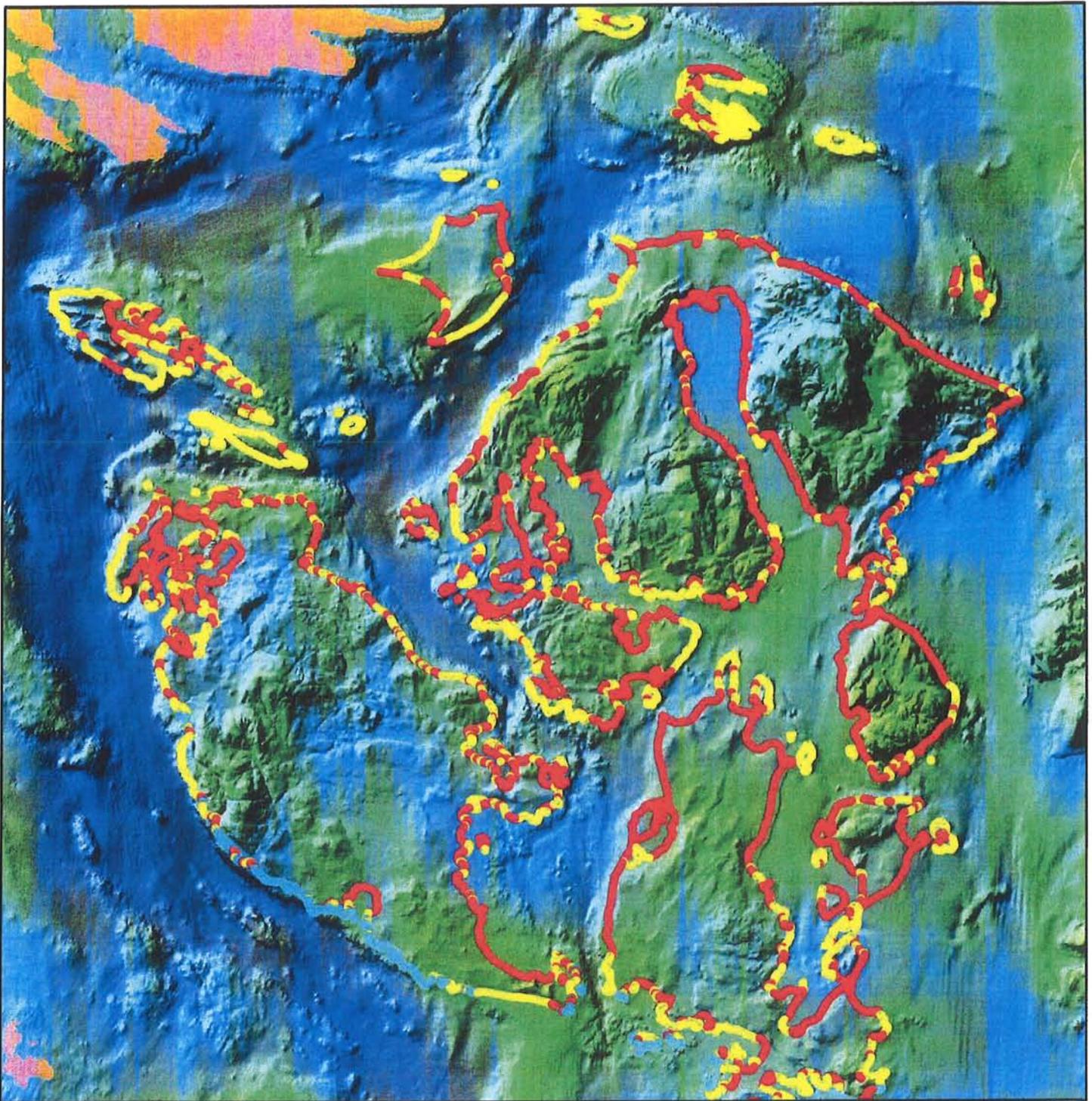
Sincerely,



John Aschoff, Chair

On behalf of the San Juan County Marine Resources Committee

Projected Oil Residence Time If An Oil Spill Occurs



Legend

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OIL_RESIDE

Days to Weeks

Weeks to Months

Months to Years

3 1.5 0 3 Miles



Data Source:
Washington Department of Natural Resources
Shorezone Dataset.

