

To: Lead Agencies  
Ref: Environmental Impact Statement Comments  
Gateway Coal Terminal  
Concern: Maritime Issues

Date: January 15, 2013

My name is Jeff Shaw; I am a resident of Ferndale, WA, a US Coast Guard Veteran and I have worked in the maritime industry since 1976 with 100% of my career in the marine transportation of crude oil. I welcome the opportunity to comment on the Environmental Impact Statement for the proposed Gateway Pacific Terminal at Cherry Point, WA. The following are major maritime concerns that are related to the proposed building of Gateway Pacific Coal Terminal that need to be studied in depth:

The proposed initial operating vessel schedule for docking at the Gateway Pacific Terminal (GPT) is 400 – 500 ships annually. This amount of additional ship traffic for the North Puget Sound will have a significant impact on the present maritime operations and will overwhelm the maritime system that is already taxed today. The following paragraphs in bold print are requests to be studied for the Environmental Impact Study:

**Vessel routing:** The proposed dock at GPT is stated to be 3000 feet long, capable of handling more than twice as many ships as GPT is projecting for docking. Consideration needs to be given for the safe navigation of all vessels operating in the North Sound. The established oil vessel traffic of hundreds of tankers and barges annually going to and from Anacortes, Ferndale and Cherry Point need to be able to continue to safely transit to their destinations without any additional risk or delay from the influx of bulker traffic going to GPT. The one-way traffic restriction in place when a tanker transits Rosario Straits requires the coordination of vessel traffic and close attention to vessel routing. The influx of hundreds of bulkers into the mix of North Sound traffic will require studies to be done on vessel routing to ensure the safe navigation for all vessels transiting the North Sound.

**Inherent Risks of Bulk Carriers:** Dry bulk cargo vessels are notoriously the most accident prone ships in the world. During a 39 day period in 2010 there was a loss of three dry bulk carriers along with the loss of 44 seafarers. As recently as last month, inexplicitly a bulker trying to dock at the Robert's Bank Coal Terminal in British Columbia missed the dock and severed the causeway leading up to the dock. Major mishaps from bulkers continue year after year, they seem incapable of improving. The State of Washington and the United States Coast Guard need to insist on the same quality standards for bulkers as they do for oil tankers that enter Washington waters.

Recommended Dry Bulk Cargo Vessel minimal standards for Washington:

- Double Hull
- Vessel size not to exceed 125,000 Dead Weight Tons
- Tug Escorts when laden in the Puget Sound
- Fully redundant steering systems
- Tug to be used when anchoring & unanchoring, laden or in ballast

- All licensed deck officers to be proficient in English
- Require <1% sulfur fuel, ISO 8217:2005 specification RMG380, in 2015 fuel with 0.1% sulfur will be required, provide for no exemptions or waivers to get around burning this fuel
- Navigation system in compliance with the federal navigation equipments set forth in 33CFR sections 164.35 – 164.46

**Tug Escorts for Bulk Coal Carriers:** According to GPT released information on their expected bulk carrier traffic at their terminal, deep draft vessel traffic will more than double today's vessel traffic in the North Sound. The increase in traffic is a big enough impact on the maritime system, but when the increase in traffic is bulk carriers, this compounds the problem. Bulk carriers are notorious worldwide for poor performance and poor safety records. The bulk carriers going to GPT will not be all the same size. What makes the best business sense is to bring in the largest size bulker that will safely make it to the GPT dock and make the largest possible delivery to China. The coal delivery ports in China can receive the Chinamax vessels, the largest in the world at 400,000 dwt and a 79' draft; it is unlikely that size ship will work for the draft at GPT. The most likely size of bulker going to GPT will be the capesize bulker at a size of 225,000 dwt. Capesize bulkers are longer, wider and deeper than the 125,00 dwt Puget Sound limited size tanker. All the tankers that go to Washington refineries are double hulled and many frequent calling tankers are redundant system tankers, tankers with double hulls, two engine rooms, and double rudders. Nowhere in the world is there a bulker with the vessel characteristics like the redundant system tankers that regularly call in the North Sound today. I don't know of any double hulled bulk carriers.

225,000 dwt coal bulk ships have the capacity to carry 60,000 to 65,000 barrels of bunker fuel. This alone is a good argument for escorting the ships when they are in Puget Sound. With the added bulker traffic there will be a huge increase in deep draft traffic; these vessels will be almost twice as large as the largest permitted tanker, they will be single hulled, with no redundant steering or propulsion. The risk of collision and groundings will increase. I feel they need to have an escort to provide for the safe navigation of all vessels when transiting the Puget Sound. It is a six hour transit from Port Angeles to Cherry Point for vessels under escort.

If GPT is approved, prior to its approval it is imperative that a risk study be performed to evaluate all that I have mentioned plus everything that was considered in the *Study of Tug Escorts in Puget Sound* completed in December, 2004 by The Glosten Associates for the Washington Department of Ecology.

For the safety of Washington's waters it is only logical to require the requested bulk vessel risk study and require tug escorts for laden bulk carriers.

**Safe Anchorages:** Designated anchorages for deep draft vessels are limited in the Puget Sound and are authorized and managed by the USCG Vessel Traffic System. In the North Sound the anchorages are limited due to exposure and depth of water. At today's level of vessel traffic, obtaining an anchorage in the North Sound requires advanced planning because anchorages often fill up and become unavailable. With the increased vessel traffic that is expected from the GPT, the hard to get anchorages today will be impossible to get tomorrow. In April of 2012 the Puget Sound Harbor Safety Committee along with the USCG reevaluated all of the anchorages based on policy set by the Captain of the Port, the North Sound anchorages are:

- Cherry Point 1 anchorage
- Bellingham Bay 6 anchorages
- Vendovi Island 5 anchorages
- Anacortes/March Point 3 anchorages

With the vessel traffic projected from GPT it is expected to at least double today's ship traffic volume in the North Sound, if this terminal operates there will not be enough safe anchorages to accommodate this amount of vessel activity, this increase will overwhelm all of the designated anchorages.

**Bunkering Availability & Logistics:** The manufacturing and availability of <1% sulfur fuel presently is not always obtainable, the <1% sulfur is manufactured at the P66 Refinery in Ferndale and at US Oil Refining in Tacoma, recently Tesoro has started producing this fuel. In 2015 the fuel specifications for deep draft vessels changes to 0.1% sulfur. Who will refine this type of fuel and availability is unknown at this time. Also unknown is if the increase of GPT ships will overwhelm the demand of available fuels.

Bunkering ships today is either done at anchor or at the dock. Coal terminals do not bunker ships at their dock; therefore bunkers would be delivered at anchor. Not all designated anchorages are safe for refueling. The allowable and safe bunkering anchorages for vessels transiting the North Sound are Port Angeles (5 anchorages) Vendovi, weather permitting (5 anchorages) and Anacortes/March Point (3 anchorages). There are no other areas in this transit route to safely refuel ships; the addition of GPT bulkers will very easily overwhelm the system.

**Ballast Water Concerns:** With the large number of additional foreign bulkers entering the North Sound I am concerned that invasive species from foreign ports will do damage to the marine ecosystem. No doubt the bulkers follow the ballast exchange requirements that are in place, but I believe the exchange procedures in place today do not completely prevent invasive species from entering Washington waters. If or when the GPT is operating all bulkers must be required to have on board approved and effective ballast water treatment systems.

**Air Quality:** The increase of hundreds more deep draft vessels planning on going to the GPT at Cherry Point there will be a substantial decrease in air quality, add the coal ship traffic to the idling coal trains at the terminal and the surrounding air quality will be severely diminished. The best achievable practice (BAP) for preventing air pollution from docked

vessels is "Cold Ironing"; this is the use of providing shoreside electrical power to a ship at berth while its main and auxiliary engines are turned off. This eliminates air pollution from ships that normally burn bunkers while docked. Cold ironing is not uncommon, the Ports of Oakland, Los Angeles / Long Beach provide cold ironing for the merchant ships. As well the Port of Port Angeles has electrical power for ships at their city dock. Another positive feature of cold ironing is that it reduces noise. Hopefully cold ironing can and will be applied to idling coal trains at the Cherry Point GPT coal terminal.

**Fatigue Management:** One of the major causes of marine accidents is crew fatigue, primarily the fatigue of the deck watch officers. There are numerous instances of bulkers grounding attributed to crew fatigue. The most recent the Seng Neng 1, in 2011, watchkeepers were so fatigued after supervising the loading of coal at Australia's Gladstone port they were not fit to carry out a navigational watch. The ship went hard aground resulting in severe damage to the ship as well as a large oil spill.

Best available practices for coal bulkers' going to GPT at Cherry Point is for crew members to comply with OPA 90 (Oil Pollution Act of 1990) work hour restrictions and STCW 95 rest period requirements. This would ensure crew members are well – rested and able to perform their duties. OPA 90 states an individual shall not work more than 14 hours in any 24 – hour period and 36 hours in any 72 – hour period, except in an emergency or a drill. These are minimum standards for fatigue management.

If you have any questions about the comments, below is my contact information.

Sincerely,

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