

# PugetSoundPartnership

LEADING PUGET SOUND RECOVERY

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GPT/BNSF Custer Spur EIS Co-Lead Agencies  
c/o CH2M Hill  
1100 112th Avenue NE, Suite 400  
Bellevue, WA 98004

RE: Scoping the Environmental Impact Statement for the Pacific Gateway Terminal at Cherry Point and Custer Spur Projects

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

Thank you for the opportunity to provide scoping comments on the Pacific Gateway Terminal and Custer Spur Projects. As both a state agency and a community of citizens, governmental agencies, tribes, scientists and businesses, the Puget Sound Partnership is charged with recovering the health of Puget Sound. To that end, we created a roadmap, the Puget Sound Action Agenda, to make Puget Sound healthy again. The Action Agenda identifies strategies and actions for protecting and restoring habitat, improving water quality, evaluating the status and identifying scientifically rigorous ways to improve the health of Puget Sound, communicating and empowering the public to behave in a way that supports Puget Sound's health, and using our resources effectively and efficiently. We believe strongly that working together we can have both a thriving economy and a clean and healthy Puget Sound.

The Pacific Gateway Terminal at Cherry Point and the Custer Spur projects are extraordinary actions that deserve thoughtful, methodical, and perhaps even ground-breaking consideration. The following is a suite of considerations, categorized by PSP's target areas, we believe critical for thorough evaluation in the Environmental Impact Statement (EIS) for the Pacific Gateway Terminal at Cherry Point and Custer Spur projects.

### General Considerations:

- What are the overall environmental impacts when considered together - from mining to transportation to export - and can these be evaluated collectively through an areawide EIS, similar to the Phosphate Mining EIS in Florida (<http://www.phosphateeis.org/>)? What impacts would be considered through an areawide EIS that would not be considered under the current scope?
- How are the short and long term impacts of the projects being considered and is there adequate mitigation for both the construction based (e.g., site development) and long-term repetitive impacts (e.g., increased train and marine vessel traffic)?
- How will the terminal at Birch Bay and the spur contribute to climate change?
- How will the use of the terminal for coal transport contribute to climate change?

### Protect and Restore Habitat Considerations:

- Will there be any changes in the management of the tracks that will impact marine or freshwater systems (e.g., more maintenance, more movement of sediment, etc.), including more shoreline armoring?
- How would the proposal change spill risks associated with increased vessel traffic?
- What are the potential impacts to streams and wetlands and how are the proposed mitigation measures adequate?

### Water Quality Considerations:

- What are the potential impacts of the proposal on ocean acidification?
- How does this proposal (train traffic, vessel traffic, and facility operations) impact toxics delivery through stormwater and non-urban runoff?
- What is the potential for ship loading to spill coal or other materials into the Sound?
- What are the potential toxicity impacts to the fish populations in the Puget Sound related to these projects?

### Species and Food Webs Considerations:

- What are the potential impacts of increased vessel traffic on eelgrass and forage fish populations, particularly Cherry Point herring?
- What are the potential impacts of construction of the terminal on eelgrass and forage fish populations, particularly Cherry Point herring?
- What are the potential impacts of increased train traffic on the feasibility of restoration opportunities along the BNSF railway, much of which is in critical estuarine habitat?
- What are the potential impacts (including human and environmental health) of coal dust resulting from transport?
- What are the potential impacts to wildlife along the transportation corridor?

### Healthy Human Population Considerations:

- What impacts would the increased shipping and train traffic have on the communities throughout the Puget Sound?
- What are the tribal treaty and cultural issues related to the projects?

Human Quality of Life Considerations:

- What will be the impact of train traffic on commuter rail traffic?
- What impacts would the increased train traffic have on automobile traffic, including emergency vehicles? Would it adversely impact quality of life or economics? What would be the impacts to air quality?
- What assurances are available around the long-term economic benefits of the projects to the Puget Sound? Will these jobs be unionized? And, will there be assurances that they will remain in Whatcom County or more broadly across Puget Sound?
- What impacts would the increased shipping traffic have on the maritime industry in the Puget Sound?
- What is the proposed approach for addressing railroad track maintenance and train derailment?
- What impacts would the increased train traffic have on maintenance of local roadways, and the resulting expense the local jurisdictions will pay for this maintenance?
- How does the proposal impact farms and livestock along the proposed route?

The Puget Sound Partnership anticipates that the issues above will be thoroughly evaluated along with all reasonable project alternatives. Further, the Partnership expects that the EIS will clearly and comprehensively outline how mitigation sequencing (avoidance, minimization, and compensation) is incorporated in each alternative. Please contact me at (360) 339-5861 or [marc.daily@psp.wa.gov](mailto:marc.daily@psp.wa.gov) with any questions or for more information about the Puget Sound's Action Agenda and the decision around these projects for recovery.

Sincerely,



Marc Daily  
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Puget Sound Partnership

Cc:

Martha Kongsgaard, Chair Leadership Council  
Commissioner Dave Somers, Chair Ecosystem Recovery Board  
John Stein, Chair Science Panel