

MEMORANDUM 3

May 31, 2011

TO: GPT MAP TEAM

FR: Cyrilla Cook, Policy Unit Supervisor, Washington Department of Natural Resources

RE: Draft Marine Biota Baseline Monitoring Plan

Thank you for the opportunity to provide input on the scope and methods for implementing the Marine Biota Baseline Monitoring Plan. Our specific comments follow:

1. Please add prop scour to the baseline monitoring plan, as it will be a necessary component of impact monitoring .
2. The area surveyed for impact monitoring should include the entire area of marine habitat that could be impacted by GPT structures and operations. That includes the area between the wharf and the shore. It is very likely that area will be impacted by the wave shadow from the wharf as well as altered hydrology and sediment transport from the trestle. Because the impact monitoring will need to cover that area, the baseline sampling needs to be expanded to cover that area as well.
3. Please add a survey for non-native and invasive species to the baseline monitoring plan, since the dumping of ballast water will be a concern at this terminal and the introduction of non-natives is a variable that should be included in the impact monitoring.
4. Please include baseline monitoring of all bivalve species . The area is used for recreational harvest.
5. Please ensure the kelp species are separated out from the red/green algae species, as kelp are of special interest to DNR.
6. The Cherry Point Environmental Aquatic Reserve Management plan requires that the new pier minimize impacts to herring spawning and herring and salmon migration from operational noise and artificial light. Baseline studies will be needed to assess minimization during impact monitoring.
7. The following additional baseline monitoring studies are required if this project proposes new outfalls which discharge into marine waters
 - a. Herring larval survival and growth test protocol validation by commercial laboratories, to determine the relative sensitivities to the effluent from approved outfalls, as per Herring Agreed Order # 3192.
 - b. Completion of herring embryo temperature tolerance study, as per Herring Agreed Order #3192.
 - c. Repeat and expand testing to investigate the cause of herring embryo abnormalities as described by Hershberger, P.K., R.M. Kocan, 1999