

Gateway Pacific Terminal Documents, Comments

From: Rave-Perkins.Krista@epa.gov [mailto:Rave-Perkins.Krista@epa.gov]

Sent: Thursday, April 07, 2011 2:53 PM

To: Dewell, Jane (ORA)

Subject: Re: GPT MAP Team Meeting - May 12

Jane:

Below are EPA's aquatic resources unit's (404 program) comments on the documents that have been submitted to the MAP Team for review.

The 404 (b) (1) guidelines require avoidance and minimization efforts to be explored and analyzed. The documents reviewed only briefly explain in general that avoidance and minimization efforts were explored (5.4.5.1 and 5.4.5.2). EPA would like additional documentation that shows options to avoid aquatic resources, such as different site layout plans, reconfiguring or moving buildings to avoid impacts. (For instance during the meeting on 3/28/2011 a comment was submitted to have one of the structures proposed along the be moved away from a wetland.) Other measures such as trestles, additional culverts and moving the location of tracks to avoid impacts should also be explored.

EPA is concerned about the proposed 36 acre "water quality pond". This location is wetland, and EPA would object to destroying wetlands in order to create a stormwater pond. Perhaps Low Impact Development and/or Leadership in Energy and Environmental Design (LEED) measures could be taken at the site to improve already existing and future stormwater issues.

For the mitigation proposal, we are not going to provide specific comments at this time. However, EPA appreciates the attempts to restore some of the stream channels on site and address water quality and water quantity and flow problems at the site. Much work needs to be done to address mitigation, once avoidance and minimization measures are fully addressed.