

April 7, 2011

TO: Pacific International Terminals, Inc. MAP Team  
FROM: Department of Ecology MAP Team members  
RE: Ecology's comments on Project Information Document and Preliminary Conceptual Compensatory Mitigation Plan for Gateway Pacific Terminal submitted by Pacific International Terminals, Inc. on February 28, 2011

Pacific International Terminals, Inc. submitted the "Project Information Document" (PID) to the multi-agency permit (MAP) team on February 28, 2011. The following comments by Ecology staff are in response to the PID and the Preliminary Conceptual Compensatory Mitigation Plan (Mitigation Plan), and are not intended to be complete comments on the project. Ecology will submit more extensive comments during the scoping phase of the SEPA/NEPA process and after review of the Draft Supplemental EIS. In the meantime, these comments are provided to the project proponent as early agency input.

The PID and Mitigation Plan reflect the great deal of time and energy Pacific International Terminals has spent researching the various environmental elements, planning the project layout, and deciphering mitigation options for the numerous potential natural resource impacts. We are impressed with the level of effort put forth to date, but as part of the MAP Team, we are providing you with our detailed feedback regarding wetlands, stormwater/water quality, and other issues so that you can move forward more effectively with Ecology's concerns in mind.

**WETLANDS** – Comments from Susan Meyer

- Avoidance is always the first step in the sequencing process for mitigation. The project proponent should consider all measures to avoid direct wetland impacts. There are several options that could be considered, such as the cut and fill that is proposed to make the eastern loop level. Instead of filling in the southern portion of the loop, please discuss whether the cut material could be hauled offsite and an elevated trestle built at the south end. This would eliminate a significant amount of direct fill. A second option would be to investigate whether the small building shown in Wetland 10A could be moved to the south or to the other side of the

conveyor trestle. These are just examples that Pacific International Terminals should consider to avoid impacts to wetlands; we are confident that other options exist.

- It is unclear whether segments of wetlands located inside of the rail loops that are not proposed for filling are part of the impacts calculation. Even though those remaining wetland segments may not be directly impacted by fill, they will incur immediate indirect effects and probable direct effects over time. All wetlands inside the rail loops must be included in the fill calculations (that is, counted as an impact) so that their loss of functions can be adequately compensated.
- Many of the proposed wetland creation areas are located in native upland (nonwetland) forests. Ecology does not support this approach, and generally does not approve wetland creation in native woody habitats regardless of the seral stage or species composition. Few if any wetland creation projects have been approved by Ecology in native upland forested habitats. From a habitat perspective, the forested wetland would not provide the functional lift to warrant destruction of decades of growth of an upland forest. In fact, many of the forest habitats on the project site are dominated by facultative species that can occur in wetlands and uplands. It does not make ecological sense to cut the trees, excavate, and replant the same or similar species just to get wetland mitigation credit.

Wetland mitigation must be sited in areas where a significant lift in most functions would occur. This includes areas previously degraded through agricultural practices, dominated by non-native species, or areas that are hydrologically manipulated through ditching, draining, etc. Using a watershed approach, one would evaluate the ecological processes in the basin, determine the extent to which the processes have been altered (or in this case, will be altered), and identifying where these processes can be restored or protected. In the end, the site or sites must be sustainable without long term maintenance. More detailed guidance is available at *Selecting Wetland Mitigation Sites Using a Watershed Approach*, available at <http://www.ecy.wa.gov/biblio/0906032.html>. If sufficient adequate mitigation cannot be found on Pacific International Terminal's property, then you will need to look off-site within the basin first, then off-site out of basin.

We recommend you consider restoration of the ecological processes of Wetlands 12 and 13 as functioning coastal lagoons. This area alone is not enough mitigation for the current proposed impacts, but a fair amount of credit could be attained in this area.

- Page 52 of the Mitigation Plan explains that the northwest portion of the site is in the Birch Bay watershed, and that Wetland 1 is a headwater to a tributary to Terrell Creek. Stormwater runoff from approximately 22 acres of this area would be diverted to the Gateway Pacific Terminal watershed, and 7.37 acres of Wetland 1 is proposed for fill. Ecology recommends that wetland mitigation options be pursued in the Terrell Creek watershed to offset the direct wetland impacts and the diversion of water away from this watershed.

- On Page 5 of the Mitigation Plan, it is explained that buffers are not shown or discussed in the plan because there will be future revisions, and they will be addressed at that time. However, this is a problematic approach when calculating mitigation acreage, since mitigation credit is not given to buffers. Once the buffers are added to each mitigation area, the acreages available for mitigation credit will change significantly. Therefore, the current acreage proposed for wetland creation and enhancement is not accurate.
- Wetland Creation is being proposed between the East and West Loops in the area of a new alignment for Stream 1. This area will be surrounded by development including a rail line and therefore would not provide the habitat protection needed. Also, all mitigation areas will be required to be protected with a conservation easement and will not be available for future development encroachment.
- Approximately 305 acres of wetland are proposed for preservation credits on-site. Many of these areas are part of the avoidance measures required in the mitigation sequencing process, so preservation credit does not apply to them. However, there may be some areas in the watershed, both wetland and upland, that are important for maintaining watershed processes that could be considered. This can be a topic for future discussion.
- An In-Lieu Fee program can be a good way to supplement on-site and in-basin mitigation for a project of this size. Since the County does not have a proposal to initiate this process currently, you may want to have some discussions with them about planned but unfunded restoration projects in the vicinity of your project. There are certain criteria to be met before this approach could move forward, but it has been done in the past, and yielded a significant benefit to the environment. When the time is right, we will be available to discuss this with you, the County and other agencies.
- Page 5-74 of the PID discusses some types of temporary impacts associated with the project. One such temporary impact is the trenching and placement of utility lines through wetlands. The report states that once the lines are in place, soil will be replaced, and the corridor replanted with trees and shrubs. In our experience, replanting woody vegetation in utility corridors is not allowed or is strongly discouraged due to the possibility of root growth interfering with or damaging the utility casing. Please provide written confirmation from the utility company that replanting is possible in these areas. Also, the utility lines may need periodic maintenance requiring vegetation removal.

Trenching through wetlands for utility placement can also disturb the natural flowpath of groundwater within the soil column in the wetland, which can in turn, cut off the water to other downslope wetlands. Since many of the on-site wetlands appear to be slope wetlands, this is especially important to acknowledge. Often, a utility company will place a bed of gravel in the

bottom of the trench, which acts as a French drain, dewatering areas both above and below the trench. Trench plugs can often prevent the wetland draining, but they need to be placed at regular intervals, and designed appropriately. We recommend that the utility trenches be designed to avoid the potential dewatering/drainage of wetlands.

- The amphibian study referenced in the Mitigation Plan was completed about 17 years ago. Since vegetation characteristics have likely changed in the forested areas, a new amphibian study is likely warranted.
- Please provide a figure on 11x17 paper (minimum) showing the wetlands and their numbers, a clear depiction of the development footprint, and all of the mitigation areas proposed.

#### **WETLANDS/STORMWATER – comments from Susan Meyer**

- Although there are no specifics in the Mitigation Plan, it appears that the large stormwater pond proposed inside of the eastern loop would be excavated within Wetland 3, and that it is part of the wetland mitigation proposal. This approach to mitigation is not appropriate for the following reasons:

Most stormwater ponds need to be maintained on a regular basis, which requires excavating soil and accumulated bottom sediments and thus, much of the vegetation growing in it. In addition, these ponds, especially those used for treatment, receive pollutants via stormwater runoff, which can overwhelm the wetland's ability to perform certain functions. As a result, Ecology considers stormwater ponds in wetlands to be direct wetland impacts and they do not receive mitigation credit. In some circumstances, ponds with multiple cells have been given partial credit as part of a comprehensive mitigation package where only one of the cells is maintained and the primary functional loss was water quality. A 36-acre pond as the one proposed is more of an open water lake and would not likely receive mitigation credit. The acreage of the pond inside the wetland boundaries will need to be added to the wetland impact calculation.

- Several of the wetland creation areas shown on Figure 7 in the Mitigation Plan are directly adjacent to the proposed rail line or other development. The Mitigation Plan says that these areas were chosen, in part, to receive stormwater from the large pond in the Eastern Loop for final treatment. This is not appropriate for the following reasons:
  1. These areas need buffers adjacent to the development footprint. There appears to be no room for buffers since some of the mitigation areas are so small.
  2. The proximity to the development footprint reduces the habitat value of the mitigation significantly, which is one of the primary functions being lost by the project wetlands, according to the functions description in the Mitigation Plan (pages 33, 34, and 38).

3. The proximity of these mitigation areas to the rail tracks, which will contain uncovered coal train cars, poses a risk of impacting the mitigation wetlands by continual coating of coal dust. Not only can this affect the vegetation growth, but the overall water quality in the wetland.
4. The stormwater plan must fully address the treatment and source control of all runoff being generated by the project. Although wetland mitigation areas can receive treated and detained stormwater, it must meet state water quality standards before being conveyed to any wetland areas, so that the beneficial uses of these wetlands will not be degraded, as stated in the Antidegradation Policy (WAC 173-201A-070). Also, the Stormwater Manual for Western Washington (Ecology 2005), Volume I, Appendix D, Page D-10 instructs the user that if a wetland is to be used for detention or treatment, it must be mitigated.

The explanation in the Mitigation Plan that the filtration capacity of the site after mitigation will improve water quality isn't supported. Although there is currently some degree of pollutant runoff from grazing cattle, there is little need for increased filtration absent future pollutants generated by the project.

- The Credit/Debit tool for assessing mitigation needs has been drafted and is out for a year of testing. Trainings for this method are starting to be scheduled, and we will apply it to this project in the near future.

#### **STORMWATER/WATER QUALITY – Comments from Steve Hood**

- No proposed contours are shown on Figures 4-1 and 4-4, but the text indicates the loops will be built on level ground. In some places the text indicates fill only (page 4-4 “engineered embankment”), and other places (page 4-63 “cut and fill are balanced”) it indicates balanced cut and fill. Regardless, the east loop has a difference in elevation of 180 feet at the junction to 96 feet at the lowest point. Given that there cannot be a 42-foot cut at the junction, it is difficult to determine how either balance cut or fill only can be accommodated on the site. Similarly, the west loop has a low point of 76 feet and is 110 feet where it clears the east loop. Proposed contours showing fill and cut catch points are necessary to evaluate the extent of ground disturbance.
- The proposed stormwater drainage plan in Figure 4-15 does not reflect major ground surface changes necessary to create the level tracks described in the text. In addition, the figure does not show the 36-acre pond mentioned in the text, which is a significant feature of the stormwater plan.

- Detention of 10 acre-feet of water for the 36-acre stormwater pond, as discussed on Page 4-43, will require communication with Dam Safety in Ecology's Water Resources Program to determine if a permit is needed.
- Figure 1-2 does not appear to show full construction. "Operational Phasing" is discussed briefly on Page 4-49, and indicates that additional tracks around both loops are planned.
- There is an indication on Pages 4-46 and 5-176 for a large On-Site Septic System. This will require coordination with State Department of Health. There is no discussion about whether there is the possibility to enter into an agreement with Birch Bay Water and Sewer District, similar to the way BP operates, to provide sewage service.
- On Page 4-64, there is no discussion regarding corrosion protection or anti fouling for the pilings under the wharf and trestle. Therefore, these impacts cannot be evaluated.
- On Page 5-67 cattle grazing in ditches is mentioned. These ditches are waters of the state, and if cattle have permanent access to water in ditches, a water quality violation is likely occurring. We depend on the Whatcom County Critical Areas Ordinance to ensure cows do not have unrestricted access to flowing water. Regardless of this project's status, grazing animals must be fenced away from any flowing water a sufficient distance to ensure that stormwater will not carry manure into it.
- Page 5-136 – Please provide wind data and metadata. The data published by NOAA at buoy station CHYW1 shows different patterns. These data will be significant if a marine discharge is planned so that a mixing zone can be modeled.

#### **STORMWATER/PERMITTING –Comments from Kurt Baumgarten**

- Section 4.3.6 of the PID- Stormwater Management Systems - Construction and Industrial stormwater will have to be managed via Section 402 of the Federal Clean Water Act under the State NPDES Permitting system. This will involve the following Permits:
  1. An NPDES Construction Stormwater General Permit with additional sampling requirements **OR** an NPDES Construction Stormwater Individual Permit with effluent limits.
  2. An NPDES Industrial Stormwater General Permit with additional sampling requirements **OR** an NPDES Industrial Stormwater Individual Permit with effluent limits.

The current PID lacks sufficient information to make a final determination at this time regarding the exact NPDES Stormwater Permits required for both the construction and industrial stormwater discharges proposed. If individual Permits are required, the associated Best

Management Practices would have to be designed to meet any numeric effluent limits assigned by the Permits. For example:

The PID does not identify proposed discharge points for stormwater. Any discharge points to surface or marine surface waters need to be plainly identified. Depending upon the location and nature of the proposed discharge, a mixing zone study may need to be completed (and wind data, as specified above would be needed).

Page 4-32 of the PID states:

*The stormwater management system would be an integral part of the civil and geotechnical design of the Terminal, and would be developed pursuant to requirements of the Stormwater Manual for Western Washington (Ecology 2005). A feasibility study and conceptual design for a stormwater management system have been completed. A preliminary conceptual stormwater plan is presented in Figure 4-15. The final design and specifications for the stormwater management system would be completed as part of the facility design, environmental review, and NPDES permitting processes.*

Page 4-44 states:

*“Final design criteria will be established during the design and environmental review process.”*

Ecology needs this information early on to help guide the applicant through the permitting process.

- The PID does not reference disposal plans for any process water generated during unloading or maintenance activities. This may include water sprayed from misters used to control fugitive dust. Process water must be managed separately from stormwater. Process water must be treated and discharged in accordance with a State Waste Discharge Permit unless treated and discharged to surface water. An NPDES Permit would be required for a surface water discharge.

#### **WATER QUALITY/PERMITTING – Comments from Loree’ Randall**

PID Page	Location	Issue or Concern	Fix, Comment or Question
2-2	Table 2-1 line 12 & 13	General NPDES Permits vs Individual	The timing of the 401 and/or CZM decision could be affected if Ecology determines that the Terminal Project requires an individual NPDES permit. Ecology cannot issue the 401 until the individual permit is issued.
2-2	Table 2-1 line 11	For CZM only list Wharf & Trestle	Need to change to “All components”.
2-3	3 <sup>rd</sup> paragraph	Refers to the wharf and trestle configuration that was permitted.	Will other configurations be looked at during the NEPA/SEPA process? If so what are they?
2-4	2.1.2 last	Implies that the JARPA that	Need to make sure that it is clear

	sentence of 2 <sup>nd</sup> paragraph	was filed with the Corps and other agencies for action.	that while Ecology and other agencies received the JARPA to review, it does not trigger the permit process for Ecology.
2-4	2.1.2 2 <sup>nd</sup> to the last paragraph		Just want to clarify on what the role of the MAP Team will be with regards to the BNSF Custer Spur improvements, and how much of the environmental analysis will be included in this document and other studies regarding the Custer Spur.



Page	Location	Issue or Concern	Fix, Comment or Question
2-6	2.1.5 first bullet.		Again, to make it clear what the project is. I would suggest "Address environmental regulatory and permit issues specific to the <b>Terminal</b> project". May want to consider adding "Terminal" throughout the document if the Custer Spur is going to be included.
2-6	2.1.5 fifth bullet.		Not sure what this bullet means?
4-4	4.3.1.1	Not a lot of details in this document about how things are going to be constructed maintained and/or operated.	Maybe it is in another document, but we will need to know: <ol style="list-style-type: none"> <li>1. How deep the dumper pit will be?</li> <li>2. How will the dumper pit be constructed?</li> <li>3. Are there concerns with ground water?</li> <li>4. When will the second unloading station be built in the east loop?</li> <li>5. What does it entail to modify the unloading station?</li> </ol>
4-8	4.3.2	Not a lot of details in this document about how things are going to be constructed, maintained and/or operated.	Same as above, plus: How will the conveyors be cleaned out?
4-21	4.3.4.1		When will the third enclosed conveyor line be construction and full build-out be considered?
Figure No. 4-7		Drawing has a water treatment plant.	What is the water treatment plant for?
Figure No. 4-9		Drawing shows an area to be excavated.	Where is the excavation in relation to the water and/or bluff?
4-31	4.3.5		If the Custer Spur is relying on these documents we need more detailed information.

Page	Location	Issue or Concern	Fix, Comment or Question
4-32	4.3.6 last paragraph, second sentence	Feasibility study and conceptual design for a stormwater management system have been completed.	Is this available for the MAP Team somewhere?
4-45	4.3.6.4 last sentence	Untreated stormwater from the trestle and wharf could contain pollutants	What are the areas that would drain into the water? Any idea of the volume. If small why not just send it to the treatment system to ensure that no pollutants get discharged.
4-46	4.3.8.1	Size of the septic fields	What is the expected amount of waste that will be discharged to the septic fields? This is needed to determine who will be permitting - Local Health, State Health, or Ecology.
4-46	4.3.8.1		How will sanitary sewage from the washroom on the wharf be treated?
4-46			How will the waste from the vessels be handled while they are docked?
4-61	4.5.7		Ecology will need to see a conceptual emergency response plan prior to issuing the 401 and/or CZM.
4-61 & 4-62	4.5.7.1		Ecology will need to see a conceptual SPCC Plan prior to issuing the 401 and/or CZM.
4-63	4.6.2	Refers to the use of concrete pumps and booms.	How much fresh concrete is going to be required? Where is the concrete coming from? How is it getting to the site?
4-65	4.6.4		Ecology will need to see the conceptual erosion and sediment control plan prior to issuing the 401 and/or CZM.
5-55	5.3.4.6		Ecology will need to see a conceptual Operations plan prior to issuing the 401 and/or CZM.

Page	Location	Issue or Concern	Fix, Comment or Question
5-57	5.4.1.2		Any physical changes (culverts, rerouting) to Stream 1 and/or Stream 2 need to be identified along with what and how work in those locations will occur.
5-71	Table 5-14		Table is nice but may need more information on how things are going to be constructed and maintained.
5-176	5.13.1.3		Where will the treated sewage for the wharf be hauled off to?

### **SEPA / GREENHOUSE GASES – Comments from Alice Kelly**

#### Section 5.7.2.3, Energy and Climate Change:

Timing of emissions analysis: The project proponent states their intention to track emissions of greenhouse gases on an annual basis as part of the company's commitment to sustainable business practices, and that the emissions estimate will be prepared following final design and permitting. Ecology and other agencies will need emissions estimates to be provided to decision makers during the SEPA/NEPA environmental review process, not after permitting is complete. SEPA requires disclosure of impacts to the environment during the environmental review phase so that agencies and decision makers have a complete accounting of the impacts before decisions are made. Additionally, an accurate estimate is needed so that appropriate mitigation, if needed, can be identified.

Scope of Emissions Analysis: The project proponent states its intention to limit the emissions analysis to scope 1 and 2 emissions within the project boundaries. However, SEPA regulations require that a lead agency consider all impacts, not just those within its jurisdiction, including local or state boundaries (WAC 197-11-060(4)(b)). Impacts to be analyzed include direct, indirect, and cumulative, as well as short-term and long-term. In addition to scope 1 and 2 emissions, the analysis should include scope 3 emissions that are caused by the project, regardless of whether those emissions occur within project boundaries. For example, the transportation impacts analysis should include scope 3 emissions emitted during transportation of commodities to and from the terminal to the extent that those emissions are new (i.e., not previously in existence).

## **SHORELINES / OTHER – Comments from Barry Wenger**

Project Area Ownership – It appears the area east of Powder Plant Road and inland from Gulf Road containing wetlands 13A-G will be used for mitigation. A description of exactly what this area will be used for should be included.

Table 2-1 should list a Shoreline Substantial Development Permit Revision for proposed changes to the project. Section 2.1.1.3 states that “No changes to the Shoreline Substantial Development Permit for the wharf and trestle are required”; however, this issue has not been resolved by the Settlement Agreement parties. Until it is resolved, this sentence needs to be deleted.

Section 2.1.1.2 should describe the existing adjacent Cherry Point Industrial Park project, including pier and trestle that has an existing, approved shoreline permit modified by a Settlement Agreement.

Section 4.3.5 Rail Access – This section states, “No interdependent projects have been identified on the BNSF Railway’s mainline—Bellingham Subdivision, or any other portion of BNSF Rail’s infrastructure.” Due to the potential impacts to the communities of Bellingham and Ferndale, and to passenger rail traffic along the coast route from Mt. Vernon to Vancouver, B.C., an alternative freight rail route should be evaluated following State Highway 9 around the north edge of Lynden to the Custer RR.

Section 4.3.6 Stormwater Management Systems – The 36-acre pond described in this section may qualify as a “shoreline of the state” under the jurisdiction of the Shoreline Management Act depending on the design and environmental functions. The proposed 100-ft buffer around the pond appears consistent with the county’s Shoreline Master Program if the pond is determined to be an SMA “lake” over 20 surface acres.

Section 4.3.6.4 Stormwater Management Systems – Access Trestle and Wharf – This section states, “It is anticipated that stormwater from other portions of the access trestle and wharf that are not exposed to potential pollutants could be drained to the adjacent upland or into the water.” Areas that are proposed to drain untreated stormwater to the marine water need to be specifically identified.

Section 4.5.5.2 Dust Control at Conveyors and Transfer Points – It is not clear from Figure 4-18 exactly how the return water from the fogging system is collected, treated and re-used, if that is the proposal for the trestle/wharf. A short description of the fate of the used dust-suppression water and any anti-leakage mechanisms is needed. In addition, a discussion of methods to control uncovered rail car generated dust, such as from coal, needs to be included.

Section 5, Table 5-1 lists “Geotechnical (Marine and Upland)” and “Hydrology” but it isn’t specifically addressing groundwater movement. Due to the potential importance of groundwater influences on the nearshore environment, groundwater flow characteristics need to be determined, proposed alterations identified, and potential groundwater pollution prevention measures established.

Section 5.3.1.4 State Priority Habitats and Species – This section incorrectly states, “Pacific herring at Cherry Point (Cherry Point herring) spawn from April to mid-June, with peak spawning activity during the first or second weeks of May.” Established long-term WDFW records document that the Cherry Point herring usually start spawning near the end of March and finish in mid-June, with the peak season from about April 10 to May 20. Although this section identifies hake and seals as primary predators on this herring stock, it should also be noted that herring comprise approximately 60 percent of the Chinook salmon diet, an ESA-threatened species in the Nooksack River.

Section 5.3.3.1 Marine Physical Processes and Bathymetry – With the latest frequency and size of vessels projected to be berthed at the wharf after full build-out, an updated analysis and description of wave attenuation with all berths occupied (worst case scenario) should be provided in addition to the currently-described “piling-only” evaluation (best case scenario). We note that the out-dated FEIS does contain some information on this subject.

Section 5.3.3.2 Marine Biological Communities – The shading study that was conducted in 1992-3 was based on the current N/S pier orientation. If the ultimate build-out of three conveyors within an enclosed structure on the pier is proposed to be different than what was evaluated in the original layout, an updated shade study will need to be prepared. In any case, a clear depiction of the ultimate build-out conveyor enclosure structure needs to be provided.

Section 5.3.4 Proposed Design Features Intended to Reduce Impacts – Mitigation being referenced and relied upon in the shoreline Settlement Agreement should be identified by topic and clearly described.

5.3.4.4 Marine Biological Communities - This section states, “As compensation for wetland impacts and general impacts to the backshore community, a coastal lagoon habitat would be constructed east of Gulf Road, adjacent to the existing coastal lagoon.” The details of this positive approach should be provided especially the culvert design connecting the east and west wetlands straddling Powder Point Road. The water access across the beach and up the road at this location is an important long-term barge off-loading site for oversized refinery and other very large heavy, industrial equipment. Removal of the old beach conveyor structure is claimed to reduce 870 square feet of shading, however, it is not demonstrated that the high, metal beam structure actually creates that amount of shading. A more accurate assessment should be provided.

5.6.2.3 Potential Effects on Rail Transportation – The rail transportation effects during operation (full build-out) need to include the effects of the 18 trains a day on the surface transportation systems of

nearby Ferndale and Bellingham. The cumulative effect of the added freight rail traffic should also be analyzed in conjunction with the existing and projected other freight and passenger rail service.

5.9.4.2 Commercial Fishing and Tourism - This section states as a mitigation measure, "Schedule construction to avoid herring spawning activities (limit construction to spring)". This appears to be an error as the spring is the herring spawning season for the Cherry Point stock.

5.15.1 Noise - This section states, "Operation-related noise impacts would occur from trucks at the terminal, railroad traffic, ships, conveyors, and material loading and handling. These noise impacts would also be audible to surrounding industrial and agricultural users but not residences. Additional rail traffic on the rail main line would increase the frequency of train noise in the vicinity (Whatcom County 1996)". Although there are relatively few residences adjacent to the project site, the residences in Ferndale and Bellingham will be significantly affected by the sound of the increased train traffic (18 trains a day) and the attendant horn blasts. A discussion of this effect should be included with potential mitigation concepts.

5.15.3 Aesthetics - This section states, "The trestle, wharf, and ships accessing the wharf would be visible from the water to a distance of approximately 1 mile". This statement appears not to be based on factual information such as a comparison to the visibility of the existing industrial piers which are considerably smaller. A more realistic description based on a visual analysis should be provided.