



# THE LEAGUE OF WOMEN VOTERS OF BELLINGHAM-WHATCOM COUNTY

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December 28, 2011

To the Scoping Agencies for Gateway Pacific

The League of Women Voters of Bellingham/Whatcom County is concerned about the pre-scoping document concerning the Gateway Pacific project.

The scoping documents must include environmental and economic impacts beyond the site of the terminal. We believe that the EIS should include these impacts and that this is according to state law reflected in SEPA as follows:

1. (A)...lead agency shall not limit its consideration of a proposal's impacts to those aspects within its jurisdiction, including local and state boundaries."

SEPA WAC 197-11-060 (4) (b)

2. "A large proposal involving actions in vastly different locations, such as material being mined at one site, then transposed to and processed at another, is another example of defining the entire proposal. Appropriate environmental review would look at the impacts of all the related activities."

SEPA Handbook, section 2.3.1.

The League hopes the county and state agencies share the League's goal to make the entire permitting process transparent and unbiased.

There is currently significant confusion about the scoping process. This is only exacerbated by the expensive public relations campaign by the project proponent, including a series of presentations to Rotary Club, while at the same time they are urging people to wait for the EIS results before making up their minds whether to support or reject the project. The pre-scoping announcement in the Seattle Daily Journal of Commerce didn't even mention the economic and regional impacts the State has promised to address. This only furthered suspicion about the process.

We ask the Department of Ecology to conduct a pre-scoping meeting

in Bellingham sometime in the first two weeks of January to clarify the procedural road map to the EIS process. This meeting should include an explanation of the respective roles of each lead agency. The League will be more than happy to co-host this public meeting. It can be clearly defined as NOT part of the scoping process itself, but as a meeting to clarify how the process will work.

Meanwhile, the League would like to request several agreements be in writing concerning the application process:

The applicant should have no involvement in selecting the consultant for the EIS.

There should be no financial dealings and/or contact between the applicant and the consultant or consultants before they are hired and throughout the process. We are assuming a state agency will be the intermediary for the financial transactions.

A revised JARPA permit should be required before the scoping process begins to give the public advance notice of what they are being asked to comment on.

And finally and importantly, a public meeting needs to be called to explain the entire process before scoping begins.

Both the Whatcom County Courthouse and the Bellingham Municipal Court have venues for large public meetings. Please contact me if you wish our help with arrangements.

Thank you in advance for addressing the concerns of our 126 members.

Sincerely,

Jayne Freudenberger/Kay Ingram

Jayne Freudenberger/Kay Ingram  
Co-presidents, LWV of Bellingham/Whatcom County