

## Guide to Writing a Scoping Comment

**Permits:** In order to build GPT, SSA must obtain two permits from the Whatcom County Council:

- Major Project Permit (MPP; also known as a Major Development Permit)
- Shoreline Substantial Development Permit (SSDP)

They must also obtain other permits from US EPA and Army Corps of Engineers (USACE), among others, but the permits we can most directly impact are from the county. After all permits are obtained, SSA will seek a lease from WA DNR to build the pier.

**Timeline:** The public will be asked to comment on scoping for the joint EIS probably 2-3 months after SSA re-files their permit applications with Whatcom County.

**Submitting Comments:** To be notified of actions by Whatcom County Planning and Development Services (PDS) regarding GPT, send an e-mail to [pds@co.whatcom.wa.us](mailto:pds@co.whatcom.wa.us) and type "GPT Subscriber List" in the subject line. When the agencies invite public comments on scoping, they will give instructions on how to submit the comments. ***In order to be a part of the official record, comments must be submitted at that time and in accordance with those instructions.*** In the meantime, questions or concerns may be directed to:

Whatcom County Planning & Development Services (SEPA), Tyler Schroeder, Planning Supervisor  
(360) 676-6907, [tshroed@co.whatcom.wa.us](mailto:tshroed@co.whatcom.wa.us)

Washington Department of Ecology (SEPA), Alice Kelly, Northwest Regional Office, Bellevue  
(425) 649-7128, [alice.kelly@ecy.wa.gov](mailto:alice.kelly@ecy.wa.gov)

U.S. Army Corps of Engineers (NEPA), Randel Perry, Regulatory Br., Whatcom County Office  
(360) 734-3156, [Randel.J.Perry@nws02.usace.army.mil](mailto:Randel.J.Perry@nws02.usace.army.mil)

For purposes of this guide, the sample impact used for illustrative purposes *only* is health impacts of diesel particulates from increased train traffic. Some examples of other major impacts are given at the end but the list is not exhaustive.

1. Clearly state, with specificity, the impact you want scoped.  
DO NOT: State an opinion ("I do not believe that...", "I fear...")  
Make an overly broad request ("I want diesel particulates from trains measured.")  
Use hyperbole ("People will die unless...")  
DO: Clearly define that which you want measured.  
Describe how the impact relates directly to you, if applicable.  
Define the breadth of the scoping necessary in terms of time and geography, and all populations potentially impacted.  
(Note: SEPA requires consideration of impacts from the source of materials to be shipped to the destination.)  
EXAMPLE: "Please scope the health impacts of diesel particulates from increased rail traffic that will result when GPT is operating at full capacity (54 mil.tons per annum). My child has severe asthma, and I live less than one-half mile downwind of the coastal route. I want to know what impact, if any, these particulates will have on her and other populations with compromised lung functions in all communities between the Powder River Basin and Cherry Point. Further, is it possible otherwise healthy populations would become compromised that would not otherwise? How do all of the measures change over time, with prolonged exposure? E.g., what are the health consequences in year 1 after the terminal is in full operation; year 5, year 20, etc.?"

2. Discuss the **significance** of the impact, and why it is **probable** and **foreseeable**.  
 DO NOT: Articulate a vague fear or an impact that is too attenuated to be measurable.  
 DO: Think in terms of **permanent and irreparable harm** (lost species; lost businesses; lost opportunities; etc.)  
 Link the harm to an activity necessary for the operation of a coal terminal.  
 Include specific references to the Project Information Document  
 (<http://www.co.whatcom.wa.us/pds/plan/current/gpt-ssa/pdf/2011-02-28-project-info-doc.pdf>) in describing the activity that will cause the impact.  
 EXAMPLE: “According to Pacific International Terminal’s Project Information Document (Feb. 28, 2011), Table 4-5, at full operation there will be 18 train trips to and from GPT per day. This is a significant increase in rail traffic on routes in Whatcom County, and a relatively significant incremental increase along rail corridors from the Powder River Basin to Washington. Because of the numbers of persons exposed along all rail corridors, even a slight individual impact, when aggregated, is significant.”
3. Request an economic analysis of the **costs**, direct and indirect, associated with the impact, if applicable, and determination of who will bear those costs.  
 DO: Include lost opportunity costs.  
 EXAMPLE: “If there are measured health consequences of exposure to additional diesel particulates, the EIS should measure the health care costs and differentiate between those anticipated to be borne by private insurance, absorbed by health care providers as unreimbursed costs, out-of-pocket expenses borne by the uninsured ineligible for Medicare or Medicaid, and/or subsidized by the state or federal governments. Further, to the extent possible, the EIS should measure lost school days, lost work days, decreased worker productivity, etc., and associate a dollar equivalent cost. Finally, if a segment of the population will become disabled, partially or totally, the EIS should measure the direct and indirect costs.”
4. Discuss the **alternative** you want the EIS to consider, including  
 a. No action  
 b. Proposal with mitigations or  
 c. Other reasonable courses of action.  
 DO: PROCEED WITH CAUTION. Do you want a coal terminal with mitigations, or do you want to stop the construction of the coal terminal? If the latter, you should discuss why mitigations are inadequate.  
 In discussing the “no action” alternative, note that this leaves SSA with the economic benefit of building the terminal permitted in 1997.

#### Partial List of Potential Impacts

Environmental:  
 Health:  
 Socio-Economic:  
 Economic: