



The U.S. Shorebird Conservation Partnership

Building Collaborative Action for Shorebird Conservation

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City of Hoquiam and the Washington Department of Ecology
Westway and Imperium Expansion Projects EISs
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

Dear Sir/Madam:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statements (DEISs) for the Westway and Imperium Expansion Projects in Grays Harbor, Washington. We, the Council of the U.S. Shorebird Conservation Partnership, ask that you reject the Westway and Imperium oil terminal proposals due to the numerous and enormous risks to shorebirds and their habitats in Grays Harbor.

The U.S. Shorebird Conservation Partnership (USSCP) represents a collective of experts, both individuals and organizations, interested in the long-term conservation of the hemisphere's shorebirds. The Council of the USSCP has long been aware of the value of Grays Harbor to migratory shorebirds, and partners there have been actively engaged in shorebird research and conservation projects for many years.

Grays Harbor Estuary provides 94 square miles of open water, saltmarshes, and mudflats that provide critical habitat for hundreds of thousands of shorebirds and is one of the most important stopover sites for shorebirds migrating along the Pacific Coast of North America. In March 1995, the value of Grays Harbor Estuary was recognized by receiving the designation as a Western Hemisphere Shorebird Reserve Network site of Hemispheric Importance, the highest level of recognition and indicating annual use by >500,000 shorebirds.

Besides the sheer numbers of passage shorebirds annually, Grays Harbor Estuary is also important for species that have elevated conservation concern status. Of 24 species recorded in the Grays Harbor Estuary, 50% are considered shorebirds of conservation concern in our most recent analysis (Shorebirds of Conservation Concern in the United States of America – 2015, U.S. Shorebird Conservation Partnership).

Specific habitats located on Damon Point and at Oyhut State Wildlife Recreation Area are designated as critical habitat for the Western Snowy Plover, which is listed as threatened under

the U.S. Endangered Species Act. Snowy Plovers forage in the tidal zone and typically nest nearby on the upper beach. Oil spills and habitat loss are recognized as major threats to the plover across its range.

Additionally, recent research by the Washington Department of Fish and Wildlife and its partners demonstrated that a large segment of the Pacific population of the Red Knot uses Grays Harbor as one of the key refueling sites during spring migration from Mexico to breeding grounds in Alaska and Russia. Resulting from the 2015 assessment referenced above, the “Pacific” Red Knot is determined to need “Immediate Management Attention”. The *beringiae* subspecies of the Marbled Godwit, with a population of about 2,000 individuals, is another shorebird of conservation concern. The godwit breeds in Alaska and migrates through and overwinters at Grays Harbor and adjacent Willapa Bay. Consequently, an oil spill in Grays Harbor, particularly during spring, could adversely affect a sizable proportion of the population of these shorebird taxa. An oil spill could cause direct mortality of shorebirds in the spill area, compromise the fitness and survival of oiled individuals, and degrade important habitats.

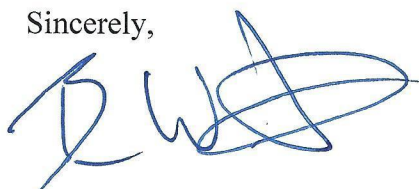
Beyond the value of Grays Harbor Estuary to shorebirds themselves, people enjoy viewing the large aggregations, and the Grays Harbor Shorebird and Nature Festival is held each year to celebrate this migration spectacle. Coastal visitors add \$481 million annually to local Washington economies, and more than one-third of them visit Grays Harbor County. The estuary also provides economic value through commercial, tribal, and sport fisheries.

The Westway and Imperium proposals, two of three proposed oil terminals for Grays Harbor located in Hoquiam, would have the combined capacity to handle 5.5 million gallons of crude oil daily and have a total storage capacity of 72 million gallons, most of it for export to China. The terminals would be fed by approximately 16 loaded oil train deliveries every week (more than two per day). If both terminals were built, a total of 638 tankers and barges of oil would need to traverse Grays Harbor every year. The twelve-mile Grays Harbor shipping channel is narrow and shallow, subjected to strong currents, and has a limited maneuvering area for ships and tug boats.

The findings in the DEISs for Westway and Imperium oil terminal proposals in Grays Harbor demonstrate that the risks of oil spills cannot be fully mitigated and the environmental damage to shorebirds and their marine food resources could be significant. Similar findings exist for waterway contamination, train accidents, increased train and oil tanker traffic, air pollution, noise, harmful impacts on tribal culture and resources, and vehicle delay at railroad crossings.

We ask that you reject the Westway and Imperium oil terminal proposals given the numerous and enormous risks to shorebirds, their habitats, and public trust lands.

Sincerely,



Brian W. Smith, Chair
U.S. Shorebird Conservation Council