



United States Department of the Interior

FISH AND WILDLIFE SERVICE

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MAR 24 2014

In Reply Refer To:
01EWF00-2013-CPA-0120

Evan Lewis
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Seattle, Washington 98124-3755

Marc Horton
Director of Environment and Engineering Services
Port of Grays Harbor
111 South Wooding Street
Aberdeen, Washington 98520

Dear Mr. Lewis and Mr. Horton:

**Subject: Public Notice and Supplemental Environmental Impact Statement Grays Harbor
Navigation Improvement Project**

This letter is in response to your public notice and Supplemental Environmental Impact Statement (EIS) for the Grays Harbor Navigation Improvement Project (NIP), located in Grays Harbor, Washington. The U.S. Army Corps of Engineers – Seattle District (Corps) manages and maintains the deep-draft Grays Harbor Federal Navigation Channel (Channel), including the entrance channel, north and south jetties, Point Chehalis rock revetment, and boat basin at Westhaven Cove Marina, under authorities that include the River and Harbor Acts of 1896, 1935, and 1945, and the Water Resources Development Act of November 17, 1986 (Public Law 99-662). The Port of Grays Harbor (Port) is the non-Federal, local sponsor for the Grays Harbor NIP.

The Corps and Port have identified their preferred alternative (Alternative 3) and propose to deepen the Channel, from the currently maintained depth of -36 feet mean lower low water (MLLW), to the fully authorized depth of -38 feet MLLW. The Corps and Port have prepared National Environmental Policy Act documentation, in the form of a Supplemental EIS, and have requested comments by March 24, 2014.

The U.S. Fish and Wildlife Service (Service) has responsibility for managing or co-managing a variety of Federal trust resources, including sensitive species which are listed or candidates for listing under the Endangered Species Act of 1973, as amended (16 U.S.C. *et seq.*)(ESA), their habitats and designated critical habitat, Federal wildlife refuges, and other fish and wildlife trust resources. During 2013, pursuant to our authorities under the Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*), the Service prepared and provided to the Corps a Planning Aid Letter (PAL) addressing the Grays Harbor NIP (dated June 7, 2013). Also, since 2011, the Service has consulted with the Corps on three related actions, including their potential effects to listed species and critical habitat: the Grays Harbor and Chehalis River Navigation Channel Maintenance Dredging Program (XRef.s 13410-2011-I-0274/-R001/-R002); the Point Chehalis Revetment Maintenance Project (XRef.s 01EWF00-2013-I-0216 and 01EWF00-2013-CPA-0107); and, a Long Term Management Strategy for the South Jetty (XRef. 01EWF00-2012-CPA-0202).

The purpose of the Grays Harbor NIP is to improve the efficiency and reliability of deep-draft vessel navigation in Grays Harbor (PAL dated June 7, 2013). Navigation along the Channel is limited by depth. Current depths are inadequate to accommodate vessels with drafts exceeding -36 ft MLLW. Some vessels have to be partially loaded or experience tidal delays due to insufficient channel depths. The action is needed to alleviate large vessel restrictions imposed by insufficient channel depths (PAL dated June 7, 2013).

The Corps and Port propose to deepen approximately 14.5 miles of the 27.5-mile Channel. This deepening would address insufficient channel depths located along south reaches A and AA, the crossover reach or channel, north channels 1 and 2, Hoquiam reaches 1, 2, and 3, and Cow Point reaches 1 and 2. Under the preferred alternative, no deepening of the Channel is proposed downstream of the Point Chehalis reach, including the entrance and bar channels.

The preferred alternative includes initial channel deepening, a dredge volume of approximately 2 million cubic yards in the year of construction. The preferred alternative also includes subsequent annual maintenance dredging, to a depth of -38 ft MLLW, for a term of approximately 50 years; this represents an incremental increase of approximately 100,000 cubic yards per year. And, the preferred alternative includes continued use and operation of the dredged material disposal sites in close proximity, including: the unconfined, open-water disposal sites at Point Chehalis, South Jetty, and Southwest; the upland Point Chehalis Revetment site; and, the two beneficial reuse sites (Half Moon Bay and South Beach), where suitable dredged materials are re-introduced to the littoral drift with the goal of nourishing adjacent beaches and preventing shoreline erosion. Under the preferred alternative, Channel depths and annual maintenance quantities would both increase by approximately 5 percent.

During 2013, the Corps considered and instituted a minor Channel alignment shift, to take advantage of naturally deeper water along the south, crossover, and north reaches/channels (XRef. 13410-2011-I-0274-R002). The preferred alternative incorporates this alignment shift, and also includes a one-time shift in the location of the Point Chehalis dredged material disposal site (i.e., for construction, but not annual maintenance, of the deepened Channel).

Based on the information available to us, the Service believes that the preferred alternative for the Grays Harbor NIP poses unacceptable risks to fish and wildlife trust resources managed and co-managed by the Service, including the Grays Harbor National Wildlife Refuge (Refuge). While we appreciate the opportunity to review and offer comments for the Supplemental EIS, we believe that significant outstanding issues remain and require further discussion.

[Please note, where this letter refers to content from the Supplemental EIS, it cites page numbers from the electronic copy, portable document format (PDF). The Supplemental EIS uses discontinuous page numbering; without this convention, page numbers are easily confused.]

Our first and foremost concern relates to the foreseeable indirect and cumulative effects of the proposed action. The Corps and Port have acknowledged that there are foreseeable indirect and cumulative effects to marine traffic in Grays Harbor, the number of future deep-draft vessel port calls, resulting patterns of channel side slope and ship-wake erosion, port operations, and port terminal expansions. These foreseeable indirect and cumulative effects have significance for the future condition of the Service's trust resources, including the Refuge, greater Grays Harbor waterfowl and migratory bird populations, and the ESA-listed western snowy plover (*Charadrius alexandrinus nivosus*; threatened), streaked horned lark (*Eremophila alpestris strigata*; threatened), and their designated critical habitat.

Grays Harbor is "...one of four major staging areas in the Pacific Flyway, [which extends] along the west coast from Alaska to Central and South America ... up to 1 million shorebirds feed and rest in Grays Harbor during their spring and fall migrations ... the Grays Harbor National Wildlife Refuge, established in 1988 to protect 1,500 acres of intertidal mudflats, saltmarsh, and uplands, ... occupies only 2 percent of the intertidal area of Grays Harbor, [but] up to 50 percent of the shorebirds forage and rest in the refuge" (PDF p. 121). The Service's Refuge is located on Bowerman Basin, adjacent to the Port's Terminal 3.

A nesting population of the ESA-listed western snowy plover is present on Damon Point and at Oyhut State Wildlife Recreation Area (Oyhut), where critical habitat has been designated (77 FR 36805; June 19, 2012; Unit WA 2 – Damon Point). The species occupies sandy beaches, inland dune systems, salt flats, mud flats, seasonally exposed gravel bars, and dredge spoil sites. The primary constituent elements (PCEs) of designated western snowy plover critical habitat include PCE 2: Shoreline habitat areas for feeding, with no or very sparse vegetation, that are between the annual low tide or low-water flow and annual high tide or high-water flow, subject to inundation but not constantly under water, that ... support essential food sources; and PCE #3: Surf- or water-deposited organic debris, such as seaweed (including kelp and eelgrass) or driftwood located on open substrates that supports and attracts ... [food], provides cover or shelter from predators and weather, and assists in avoidance of detection ... for nests, chicks, and incubating adults. Oil spills are recognized as a threat to the species across its range, and the wreck of the *S.S. Catala* on Damon Point, as an example, is believed to have resulted in direct and indirect impacts to western snowy plovers (77 FR 36754; June 19, 2012).

A nesting population of the ESA-listed streaked horned lark is present on Damon Point and at Oyhut, where critical habitat has been designated (78 FR 61561; October 3, 2013; Unit 3A – Damon Point/Oyhut). Streaked horned larks nest and winter on Damon Point where an open

landscape context and sparse, low-growing vegetation provide the physical and biological habitat features that are essential to the species. The PCEs of designated streaked horned lark critical habitat include: areas having a minimum of 16 percent bare ground with sparse, low-stature vegetation composed primarily of grasses and forbs less than 13 inches (33 cm) in height; and, large (300 acre), flat (0 to 5 percent slope) areas, or smaller areas, within a landscape context that provides access to open areas, such as open water or fields. Across their range, streaked horned larks commonly occupy low-lying coastal beaches, dunes, and dredge spoil sites.

The Corps and Port have acknowledged that the Grays Harbor NIP will have foreseeable indirect effects to marine traffic in Grays Harbor, the number of future deep-draft vessel port calls, and related port operations:

Environmental Consequences, Indirect Effects. “It is reasonably foreseeable that the enhanced channel dimensions may ... induce shippers to increase the cargo throughput of the Port” (PDF p. 192). “The most reasonably foreseeable consequence of any increase in cargo volumes handled through the Port ... would be an increase in deep-draft vessel calls ... growth in cargo tonnage moved through the Port would generate an increase in deep-draft vessel calls, with 16 more total annual vessel calls in 2027 under Alternative 3 than Alternative 1, and 32 more annual vessel calls projected in 2037” (PDF p. 193, 195).

Socioeconomics and Environmental Justice. The preferred alternative would “...have a beneficial effect on the local economy ... vessel operations would be more fully improved, allowing fuller loads per vessel and reducing ocean transportation costs”; there would be a “...longer window of availability for vessel transits into and out of the Port”; the preferred alternative would “...better support jobs related to the Port facilities ... [which] depend on reliable navigation through the harbor” (PDF pp. 29, 30).

Cumulative Impacts. “...Reasonably foreseeable future actions ... include ... proposed Port of Grays Harbor terminal expansions”; “...these actions could have cumulative effects on ... marine transportation, benthic invertebrates, fish and wildlife, water quality, noise, air pollution, and [greenhouse gas] emissions” (PDF pp. 33, 34).

Our contention is that the Corps’ and Port’s preferred alternative for the Grays Harbor NIP would facilitate, make possible, and promote or encourage selection of Grays Harbor as a destination for additional, future shipping and port operations. The Corps and Port have tried, unsuccessfully, to argue that the proposed action would “...not result in an increase in the size or number of vessels navigating the harbor ... compared to baseline conditions (i.e. Alternative 1)” (PDF p. 210). And yet, on the very next page (PDF p. 211), the Corps and Port state that “...Alternative 3 would add as many as 32 annual deep-draft vessel transits as compared with Alternative 1”. A future increase to the number of deep-draft vessel port calls is foreseeable, and attributable to the Grays Harbor NIP. However, we do not have confidence that the Corps and Port have accurately or reliably projected the size of this increase.

The Corps and Port have acknowledged in Chapter 4 (Environmental Consequences) that the potential indirect effects of the proposed action include those resulting from erosion of the channel side slopes and/or altered patterns of ship-wake erosion:

Environmental Consequences, Geomorphology, Potential for Ship-Wake Erosion.

“Alternative 3 would add as many as 32 annual deep-draft vessel transits ... This 3.5 percent increase in vessel transits ... annually would have no more than a minor incremental effect on ship-wake erosion of the Grays Harbor shoreline” (PDF p. 211).

The Service does not agree that the Corps and Port have accurately or reliably projected the likely future number of deep-draft vessel port calls. Therefore, this conclusion is not supported.

The Corps and Port have acknowledged that foreseeable cumulative effects include port terminal expansions. Proposals that would bring crude-by-rail (CBR) bulk fluid storage and transloading/shipping operations to property owned and managed by the Port are now pending:

Cumulative Effects, Proposed Port of Grays Harbor Terminal Expansions. “Three independent projects to bring crude oil (and other bulk liquids) by rail to the Port of Grays Harbor are being proposed for Terminals 1 and 3 ... The Port owns the property on which the projects are proposed, but is not the proponent/applicant ... Operation of these terminal expansion projects would ... increase noise, air pollution, GHG emissions, and the potential for spills that could affect water quality in Grays Harbor because of increased train traffic transporting bulk liquids to the terminals and increased marine traffic associated with the tugs and transport vessels conveying bulk liquids to and from the terminals ... Although spill prevention and protection plans would be required to minimize and reduce the potential for oil spill impacts, the possibility of a spill cannot be fully discounted ... The environmental effects of increased marine traffic ... would be generated independent of the implementation of the Corps’ preferred alternative, and thus would not constitute direct or indirect consequences of the proposed Federal action.” (PDF p. 310).

The Port operates four marine terminals. According to Chapter 3 (Affected Environment), one of the Port’s current tenants (Imperium Terminal Services, LLC) recently proposed to expand operations on Port property (PDF p. 81). Another party, “Grays Harbor Rail Terminal, LLC, is proposing a bulk liquids rail logistics facility at Terminal 3 ... The facility would be designed to handle liquid bulk, primarily crude oil or light oil” (PDF p. 82). The Port markets their location and services as the only “deep-water” port on the Washington coast (Port of Grays Harbor 2014).

Our contention is that the Corps’ and Port’s preferred alternative for the Grays Harbor NIP would facilitate, make possible, and promote or encourage selection of Grays Harbor as a destination for additional, future shipping and port operations, including candidate CBR bulk fluid storage and transloading/shipping operations. These foreseeable indirect and cumulative effects raise for us very serious concerns regarding proximity to the Refuge, proximity to vulnerable habitats that support ESA-listed species, and to greater Grays Harbor waterfowl and migratory bird resources in general.

Our position is that a Terminal 3 CBR bulk fluid storage and transloading/shipping operation would be incompatible with the environmental conditions we seek to maintain on the Service's neighboring Refuge. Furthermore, regardless of specific siting decisions, we agree with the Corps and Port that the possibility of a future oil spill(s), and the potential for resulting impacts, cannot be fully discounted.

There are three or more projects being considered that would bring CBR bulk fluid storage and transloading/shipping operations to property owned and managed by the Port (Port of Grays Harbor 2014). The State of Washington Shoreline Hearings Board (Board) has determined that the first of these was brought forward without adequately considering cumulative effects. On November 12, 2013, the Board issued a ruling that invalidates the State Environmental Policy Act Mitigated Determination of Non-Significance issued at an earlier date for proposals brought by Imperium Terminal Services, LLC and the Westway Terminal Company (Washington State Shoreline Hearings Board 2013). The Board found that, "together the two projects would add approximately 18 additional loaded and unloaded trains per year, and approximately 520 vessel transits per year into the Grays Harbor area". The Board ruled that, "...the Co-leads [Washington State Department of Ecology and City of Hoquiam] erred by failing to consider impacts from USD [U.S. Development; proponent for a Terminal 3 expansion] along with their consideration of the impacts from Westway and Imperium" and "...information that addressed the potential for impacts was required before the Co-leads made their threshold determination, not afterwards."

The Corps and Port have tried, unsuccessfully, to argue that the proposed action would not change significantly the intensity of future marine traffic. Some content from the Supplemental EIS tries to argue that there will be no change, while other content acknowledges only a very modest increase in future marine traffic. However, contrary to these claims, another reputable party (the Board) has concluded that future cumulative effects could very well include hundreds of additional deep-draft vessel port calls per year (Washington State Shoreline Hearings Board 2013).

The Corps and Port have acknowledged, but not adequately assessed or addressed, the proposed action's significant indirect and cumulative effects. To date, the very real and significant risks that increased shipping and port operations would present to vulnerable coastal and marine ecological resources have not been adequately addressed. The Corps and Port should expect that the Service will seek every opportunity to reinforce these concerns during the months and years ahead. We would welcome an opportunity to discuss these concerns with the Corps, Port, the Washington State Departments of Ecology (Ecology) and Fish and Wildlife, tribal governments (including the Quinault Indian Nation), and the U.S. Coast Guard – Marine Safety Unit (Coast Guard). We offer the following recommendations:

- 1) We advise against siting a bulk fluid storage and transloading/shipping operation at Terminal 3. A decision to site CBR facilities on land directly adjacent is incompatible with the environmental conditions we seek to maintain on the Service's neighboring Refuge. A bulk fluid storage and transloading/shipping operation located at Terminal 3 would present unacceptable risks to Service trust resources.

- 2) The Corps and Port should reconsider their preliminary plans for wasting dredged material deemed unsuitable for open-water disposal. The Service does not support placement of this material at the former City of Hoquiam municipal wastewater treatment lagoon (located on Airport Way, Paulson and Moon Island Roads), adjacent to the Port's Terminal 3, Bowerman Basin, and the Refuge (PDF pp. 68-72).
- 3) The Corps, Port, and their Applicants should invite, initiate, and engage in inter-agency coordination before advancing proposals that would bring additional bulk fluid storage and transloading/shipping operations to the Port. The proponents for these Port terminal expansions and redevelopment must demonstrate in a convincing way that these operations will be held to the highest possible performance standards. Input from Ecology and the Coast Guard should be sought, especially in the areas of port safety, spill response, and contingency planning. The Quinault Indian Nation has expressed legitimate concerns and should be invited by the Corps and Port to participate in government-to-government coordination and negotiations.
- 4) The Corps, Port, and other parties with regulatory authority, including Ecology and the Coast Guard, should carefully consider proximity to vulnerable and irreplaceable coastal and marine ecological resources when making siting determinations. The Service recognizes that the Port has a responsibility to manage public resources for economic development and other legitimate objectives. But the Port must also mitigate and manage associated risks and potential effects to public resources that are not their own. Port operations are a preferred, water-dependent use of State-owned aquatic lands, but such use should not damage coastal and marine habitats that cannot be replaced. Siting determinations must evidence a thorough consideration of these factors.
- 5) The Corps, Port, and other parties with regulatory authority must consider alternatives that would achieve the same or similar economic development objectives. If better, safer, and more compatible uses of the Port's facilities are not given equal and fair consideration, they should expect that the Service will seek every opportunity to reinforce our stated concerns.

Thank you for the opportunity to review and offer comments for the Grays Harbor NIP Supplemental EIS. We hope that the Corps and Port are willing to engage in continued coordination. The issues we've highlighted above are not insurmountable, but resolving them will require that all parties act transparently and with attention to the concerns of others. Please contact the Service staff and/or managers identified at the close of this letter if you have questions regarding our comments, or related concerns or requests.

Other Comments

- Re: Mitigation Measures for Dungeness Crab. The Corps will continue to implement the *1998 Revised Crab Mitigation Strategy Agreement* (PDF p. 33). This agreement requires that the Corps assess impacts with the Dredge Impact Model and provide compensatory mitigation. The Corps' historic and continuing practice for mitigating dredge impacts, including impacts from incremental maintenance, involves the placement of oyster shell


to create and maintain refuge habitat for juvenile Dungeness crab (*Metacarcinus magister*). The preferred alternative would increase incremental maintenance. Therefore, we recommend and expect that the Corps' will correspondingly increase their commitment to mitigation for unavoidable impacts to Dungeness crab.

- Re: Dredged Material Deemed Unsuitable for Open-Water Disposal. According to Chapter 2 (Alternatives), both Alternatives 2 and 3 would produce (during construction) a quantity of dredged material that is unsuitable for open-water disposal. Alternative 3 would produce "...approximately 22,400 cubic yards ... unsuitable for open-water disposal because of toxicity expressed in the sediment larval bioassay" (PDF p. 72). The Corps and Port propose to de-water and waste the material at the former City of Hoquiam municipal wastewater treatment lagoon located on Airport Way, Paulson and Moon Island Roads, adjacent to the Port's Terminal 3, Bowerman Basin, and the Refuge (PDF pp. 68 and 69). We urge the Corps and Port to reconsider their preliminary plans for wasting dredged material deemed unsuitable for open-water disposal. We do not support placement of this material at the former City of Hoquiam municipal wastewater treatment lagoon.
- Re: Affected Environment, Fish and Wildlife. Content included in Table 3.4-5 (PDF p. 113) mischaracterizes the ESA status of Coastal/Puget Sound bull trout (*Salvelinus confluentus*). The species is listed as threatened throughout its range.
- Re: Affected Environment, Threatened and Endangered Species. Content included in Table 3.5-1 (PDF p. 126) mischaracterizes the status of designated critical habitat for the streaked horned lark. Designated critical habitat is, in fact, present within the action area, on Damon Point and at Oyhut (Subunit 3-A: Damon Point/Oyhut; 78 FR 61561; October 3, 2013).
- Re: Affected Environment, Recreation. Content from the Supplemental EIS mischaracterizes the location of the Refuge. The Refuge is not located "...at the mouth of the Chehalis River" (PDF p. 160). The Refuge is located on Bowerman Basin, adjacent to the Port's Terminal 3 and the proposed location for wasting dredged material deemed unsuitable for open-water disposal. We do not support placement of this material at the former City of Hoquiam municipal wastewater treatment lagoon, and urge the Corps and Port to reconsider their preliminary plans.
- Re: Environmental Consequences, Alternative 3, Fish and Wildlife. "Except for the increased dredge duration required for Alternative 3 the impacts to sturgeon, lampreys, salmonids, marine mammals, reptiles, and birds are anticipated to be similar in nature and magnitude to those identified for Alternative 1" (PDF p. 241). In light of our other stated concerns, the Service does not agree that these conclusions are well-supported. The Corps and Port have not adequately addressed all of the reasonably foreseeable effects of the action.

- Re: Environmental Consequences, Threatened and Endangered Species. Content included in Table 4.5-1 (PDF p. 246) mischaracterizes presence of the streaked horned lark. A nesting population of the streaked horned lark is present on Damon Point and at Oyhut. Critical habitat has been designated for the species and is present at both locations (Subunit 3–A: Damon Point/Oyhut; 78 FR 61561; October 3, 2013).
- Re: Environmental Consequences, Threatened and Endangered Species, Snowy Plover. “Plover nesting habitat at Damon Point is outside of the limits of measurable noise effects and thus is not affected ... [and] we do not expect that changes in sediment transport and deposition resulting from the proposed maintenance dredging and disposal activities will have measurable effects on western snowy plover nesting habitat” (PDF p. 254). Temporary sound resulting from dredging and dredged material placement is the least of the Service’s concerns regarding this action. We do agree that the action’s effects to sediment transport and deposition are likely to be minor. However, we are not convinced that the Corps and Port have adequately addressed all of the reasonably foreseeable effects of the action. Likely increases to deep-draft vessel port calls, the possibility of increased ship-wake erosion, and the real and significant risks that increased shipping and port operations would present to irreplaceable coastal and marine ecological resources have not been adequately addressed.
- Re: Environmental Consequences, Threatened and Endangered Species, Streaked Horned Lark. “Maintaining the channel might cause a discountable and insignificant change in the sand budget and sand movement ... these in turn, could have a discountable and insignificant effect on Damon Point ... Damon Point is likely to remain as a feature (although it will likely continue to change shape) into the foreseeable future” (PDF p. 256). The preferred alternative incorporates a long term maintenance program. Resulting measurable effects to geomorphology and sand budgets, including shoreline development along Damon Point, are not discountable (“extremely unlikely”). Maintenance of the Channel inherently alters normal geomorphic processes. We agree, however, that Damon Point is likely to remain as a feature.
- Re: Agency Coordination and Public Outreach, U.S. Fish and Wildlife Service. “A draft Fish and Wildlife Coordination Act Letter Report was prepared by USFWS for the proposed action” (PDF p. 325). It would be more accurate to state that the Service prepared an abbreviated PAL (dated June 7, 2013). The Service also participated in a series of meetings, narrowly constrained to the topic of mitigation for dredge impacts to Dungeness crab. These meetings did not lead to proposals that would change the historic and continuing practices for mitigating dredge impacts, despite the fact that many good suggestions were offered by participants. Service involvement in the Corps’ planning process for this action was curtailed after June 2013 given the lack of progress and in light of increasing constraints on Service staff and resources. No Fish and Wildlife Coordination Act Letter Report has been prepared for the current, proposed action.

If you have any questions about this letter, would like to discuss our comments, and/or meet in-person, please contact Ryan McReynolds (ryan_mcreynolds@fws.gov; 360.753.6047), or Bridget Moran (bridget_moran@fws.gov; 360.753.6044).

Sincerely,



Ken S. Berg, Manager
Washington Fish and Wildlife Office

cc:

FWS, Nisqually NWR, Olympia WA (G. Nakai)
Corps, Seattle, WA (J. Jackson)
Quinault Indian Nation, Taholah, WA (K. Allston; M. Mobbs; J. Schumaker)
WDFW, Montesano, WA (S. Kalinowski; B. Burkle)
WA Office of the Attorney General (for Ecology), Olympia, WA (A. Bazan; T. Young)
U.S. Coast Guard, Portland, OR (R. Berg)

Sources Cited

Port of Grays Harbor. 2014. Proposed crude oil export facilities. Available On-Line
<<http://www.portofgraysharbor.com/about/CBR-Project.php>> (Accessed 3-20-2014).

Washington State Shoreline Hearings Board. 2013. Quinault Indian Nation v. City of Hoquiam, Ecology, and Westway Terminal Company LLC (Case Number 13-012c; Closed: 11/12/2013). Available On-Line <<http://www.eho.wa.gov/CaseDetails.aspx?cid=5088>> (Accessed 3-20-2014).