January 11, 2013

GPT/BNSF Custer Spur EIS Co-Lead Agencies
1100 112th Avenue Northeast, Suite 400
Bellevue, Washington 98004

Re: Scoping comment requesting the scope of the EIS to include a study of potential impacts on historic buildings in Mount Vernon under the NHPA Section 106, NEPA and SEPA

Dear Sir or Madam:

We are writing to provide scoping comments to help guide preparation of an Environmental Impact Statement and Section 106 review for the Gateway Pacific Terminal Inc.'s (GPT) project at Cherry Point, Washington and the Burlington Northern Santa Fe (BNSF) Railway's Custer Spur Rail Expansion project (referred to collectively as GPT), pursuant to National Environmental Policy Act (NEPA), the Washington State Environmental Policy Act (SEPA) and the National Historic Preservation Act (NHPA). It is our understanding that the draft EIS will be prepared according to the requirements of these federal and state laws.

According to Gateway Pacific Terminal Inc.'s Project Information Document for the GPT (Feb. 28, 2011)(PID), Table 4-5, p. 4-53, http://gatewaypacificterminal.com/wp-content/uploads/2011/09/GPT%20PID%20DOCUMENT.pdf, in order to meet the applicant's stated need, at full operation of the terminal there would be 18 additional daily train trips for the GPT through Mount Vernon and into and out of the terminal by way of the proposed expansion of the Custer Spur. Also according to the PID, each of these long-haul trains would be as much as 150 to 170 cars long (approximately a mile and a half long or longer) with each car containing 101.6 to 109 metric tons of bulk products, predominantly coal. The PID also says that the weight of each of the trains going to and from the GPT would range from 16,350 metric tons to 17,272 metric tons. The trains would travel on the BNSF railway through downtown Mount Vernon, the Skagit Valley and 120 other communities along the rail line to reach their destination at the GPT. Trains currently transporting coal through Mount Vernon to B.C. ports typically use 4 to 5 diesel locomotives. It is foreseeable that the coal trains to a GPT would also use 4-5 diesel locomotives.

We are residents of Mount Vernon who have a particular interest in downtown Mount Vernon, its historic structures and its present status as a Main Street community. Mount Vernon is part of the National Trust Main Street Program and the Washington Main Street Program, revitalization programs based on the unique heritage and attributes of the city's historic downtown. Two of downtown Mount Vernon's historic buildings, the President's Hotel and the Lincoln Theater, are on the National Register of Historic Places. Other downtown buildings, although not currently on the National Register of Historic Places, meet at least one of the criteria (and some buildings meet more than one of the criteria) for listing on the register in that they are more than 50 years old. Of course many of the historic buildings in Mount Vernon are much older than 50 years. The City of Mount Vernon has invested considerable effort and public monies on a Downtown and Waterfront Master Plan to revitalize its historic downtown and celebrate its heritage on the Skagit River, http://wa-mountvernon.civicplus.com/index.aspx?NID=124 .

The rail line through Mount Vernon is already a heavily-used rail corridor (defined as more than 12 trains per day in the U .S. Department of Transportation, Federal Transit Administration document Transit Noise and Vibration Impact Assessment (May 2006) http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf). About 15 trains per day currently travel through Mount Vernon, including 3 trains transporting coal to B.C. ports (at present, about 3 up and 3 back). The trains associated with the GPT will be in addition to existing rail traffic and future rail traffic that will also foreseeably travel through downtown Mount Vernon; therefore an indirect but foreseeable significant impact of the GPT will be a significant increase in rail traffic through downtown Mount Vernon.

Please include within the scope of the EIS for GPT a comprehensive study of the impacts of noise and vibrations from heavy long trains to and from GPT on downtown Mount Vernon's historic buildings, including impacts upon persons and activities and the risk and consequences of structural damage. The study should evaluate the potential for deterioration, structural damage and destabilization of historic buildings from the vibrations from GPT trains both in the short run and over the life of the proposed GPT. Please include a review of the cumulative impacts from trains that would support GPT's export activities in addition to all existing and foreseeable future rail traffic, including planned oil tanker trains to Cherry Point and Anacortes, the proposed beverage bottling facility in Anacortes, additional freight rail traffic to B.C. and Amtrak Cascades expansion.

The study should examine and take into consideration the type of soils upon which the historic structures rest in downtown Mount Vernon using reliable and scientifically accepted soil classifications to help determine how vibrations from heavy trains may be propagated and attenuated. Currently acceptable state of the art vibration monitoring equipment should be used to measure the impacts of coal trains currently transporting coal through Mount Vernon to B.C. ports to predict and model impacts upon historic structures and appropriate vibration simulations should be conducted (although it must be recognized that these trains may not be as long as some proposed by GPT).

The study should also include consideration of the fact that historic downtown Mount Vernon buildings, which are of brick and mortar construction, are in an earthquake zone (see, WA Department of Natural Resources, site class map for Skagit County (2004), ftp://ww4.dnr.wa.gov/geology/pubs/ofr04-20/ofr2004-20_sheet58_skagit_nehrp.pdf). Reviewers should study whether the impact of air and ground borne vibrations from heavy trains to and from GPT increase the risk of deterioration, structural damage or destabilization of historic buildings in downtown Mount Vernon for buildings that may have been previously affected by an earthquake(s).

Please also conduct a comprehensive study on the impacts of noise (including train horns, sound of wheels -rails, brakes, diesel engine exhaust noise) from trains to and from GPT on customers, activities, employees or operations in the businesses that populate downtown Mount Vernon's historic buildings. How would noise and vibrations in downtown Mount Vernon impact tourism and special annual events that are important to downtown businesses like the annual Tulip Festival? Who would bear the costs of impacts from vibrations and noise on Mount Vernon's historic downtown buildings and businesses? What would be the impact of noise and vibrations, along with traffic disruptions from blockages of downtown at grade crossings by trains, on the City of Mount Vernon's investment in its Downtown and Waterfront Master Plan? Documents such as:

- the U.S. Department of Transportation, Federal Transit Administration, Transit Noise and Vibration Impact Assessment (May 2006) http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf, and
- Jones & Stokes, Transportation- and construction-induced vibration guidance manual (J&S 02-039.) Sacramento, CA. Prepared for California Department of Transportation, Noise, Vibration, and Hazardous Waste Management Office, Sacramento, CA (June 2004) http://www.dot.ca.gov/hq/env/noise/pub/vibrationmanFINAL.pdf and the attachment to that document:
- Hendriks, Transportation Related Earthborne Vibrations (Caltrans Experiences) Technical Advisory, Vibration TAV-04-01-R0201 (January 23, 2004)

and the references in these documents may provide a useful starting point for the reviewers in the preparation of the comprehensive study on this topic and in determining mitigations such as those outlined in the manuals.

The impacts upon Mount Vernon from heavy long trains to and from GPT, including cumulative impacts, of the GPT project on historic structures and businesses and activities within those structures are foreseeable and will be significant. We value Mount Vernon's unique heritage. Harm to or loss of historic buildings here could be devastating for our community and businesses. The co-lead agencies must carefully study and consider the impacts discussed in this comment, rigorously applying Section 106 of the NHPA, NEPA and SEPA to avoid harming historic landscapes and buildings in Mount Vernon as well as in communities all along the rail line that have historic structures. Many important historic structures are found in western communities all along the rail route from the mines in Wyoming and Montana to GPT. Please study the historic structures and landscapes in these communities. Thank you in advance for responding to our comment letter by including these impacts in the scope of the EIS and for conducting comprehensive studies on these impacts.

Sincerely,

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