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January 18, 2013

Tyler Schroeder  
Designated SEPA Official  
GPT/BNSF Custer Spur EIS Co-Lead Agencies  
c/o CH2M HILL  
1100 112th Avenue NE, Suite 400  
Bellevue, WA 98004

**SUBJECT: SEPA SCOPING COMMENTS ON GATEWAY PACIFIC COAL  
TERMINAL**

Dear Mr. Schroeder:

Thank you for the opportunity to comment on the SEPA Scoping Notice for potential impacts of the proposed Gateway Pacific Coal Export Terminal upon the City of Vancouver and its citizens. Vancouver is uniquely situated at the intersection of major rail corridors which lead to points east and north and south. The BNSF rail lines run through the City of Vancouver East-West along the Columbia River and North-South west of the downtown. A significant amount of rail freight traffic travels through Vancouver city limits and most, if not all, of the coal trains headed to or from the Gateway Pacific facility will pass through Vancouver city limits.

As reflected in the City Council's Resolution of July 16, 2012 (attached), and in public testimony received at a Clark College forum on the project on December 12, 2012, the City of Vancouver has a number of concerns with the project in regard to potentially significant adverse impacts.

Please include the following in your Scoping Notice:

1. Impacts from Coal Dust. Substantial uncertainty exists, including contradictory evidence, about the potential environmental effects from coal dust that may blow off or otherwise escape the coal cars. The EIS should study and conclusively determine what direct and cumulative impacts may occur to human health or natural systems such as wetlands, soil, vegetation and streams. How much coal dust is likely to blow off or shake out of the open coal cars, based on the latest scientific studies? Serious consideration should be given to

requiring that all coal cars which access the Gateway Pacific Terminal be covered during transport in order to mitigate such impacts to a level of non-significance.

2. Blocked Crossings. Vancouver has as many as 18 private at-grade crossings and at least 8 public at-grade crossings. Given the projected length of the trains (up to a mile and-a-half per train) and the projected number of trains per day (as many as 20) that will be moving through Vancouver, there will be substantial delays at at-grade vehicle crossings. Such delays will result in increased residential and commercial traffic congestion, lost productivity, increased tailpipe emissions from idling vehicles, etc. Direct and cumulative impacts from blocked crossings need to be studied in the EIS, and mitigated to a level of non-significance.
3. Delays to Emergency Responders. Some residential areas along the Columbia River could be entirely cut off from emergency responders due to the length of the trains and slow speeds of the trains in city limits, or from trains that are stopped waiting for other trains to move. Emergency responders may have no alternative but to access such areas by boat. How will blocked crossings impact the ability of the fire department to respond to a fire or medical emergency, or the police to respond to a crime in progress? Such direct and cumulative impacts should be studied in the EIS and mitigated to a level of non-significance, which should include ongoing funding for the operation and maintenance of the City's fire boat and associated staff.
4. Impacts from Surfactant. To what extent does the chemical surfactant that is sprayed on the coal to minimize airborne transport of dust break down over time and under different weather conditions (e.g. heat, cold, precipitation, etc.)? What are the chemical components in the surfactant, and when the surfactant breaks down and is transported into the air, what are the potential health hazards and impacts to water, soil and vegetation? Direct and cumulative impacts from airborne or deposited surfactant released from the coal cars should be studied in the EIS. Again, mitigating such potential impacts by requiring the coal cars to be covered should be considered in the EIS.
5. Train Horn Noise. As noted above, there are at least 26 at-grade crossings within Vancouver city limits, and many of these are unsignalized crossings. Impacts from train horn noise to nearby residents or employees from as many as 20 additional trains per day should be studied in the EIS, and mitigated to the extent possible.
6. Increase in Train Diesel Emissions. It has been reported that, due to the anticipated length of the trains (up to one and a half miles), additional engines to pull or push the cars will be required, which will significantly increase localized impacts from diesel emissions. If each train requires twice the number of engines to haul the coal cars than a typical freight train, then the impacts from diesel emissions would be comparable to 40 trains per day, instead of 20. What are the potential adverse health impacts to nearby residents or employees from such an increase? What are the impacts to the local or regional air quality from such an increase? The amount of diesel emissions from the total number of engines needs to be quantified and the direct and cumulative health and air quality impacts should be studied in the EIS and mitigated to a level of non-significance.

7. Cumulative Impacts from Other Coal Export Facilities. The Gateway Pacific Terminal is one of several coal export facilities that are proposed in the States of Washington and Oregon. Cumulative impacts that can be reasonably anticipated from all other proposed coal facilities, whether or not a permit application has been filed, should be studied in the EIS, and potentially significant impacts mitigated to a level of non-significance.

Again, thank you for the opportunity to provide comments on the SEPA Scoping Notice for the GPT facility. We look forward to commenting further once the Draft EIS is made available for public comment.

Sincerely,



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