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RE: Scoping Comments on the Gateway Pacific Coal Export Terminal at Cherry Point

To whom it may concern:

Please consider this letter as part of the public record for the Gateway Pacific Terminal coal export project proposed at Cherry Point, Whatcom County, Washington, facility site ID #22237. The impacts of coal export at Cherry Point extend far beyond the terminal, reaching into every community located along the rail line between the coal mines and the export terminal. As a elected official for the City of Washougal, Washington, located along the Burlington Northern Santa Fe (BNSF) rail line, I respectfully request that the U.S. Army Corps of Engineers, Washington Department of Ecology, and Whatcom County (collectively “the lead agencies”) fully disclose and carefully assess the impacts of the Gateway Pacific Terminal on our community.

Pacific International Terminals, a subsidiary of SSA Marine, proposes to export 54 million metric tons of coal annually. This coal will travel in uncovered rail cars through dozens of communities, including Washougal, en route to the proposed Whatcom County terminal. Aside from the impacts of coal export at and near the terminal, the Environmental Impact Statement (EIS) must examine the impacts of coal trains and the coal export industry on our citizens, local environment, and quality of life. This includes the direct, indirect, and cumulative impacts of coal export on public health, traffic, existing businesses, public infrastructure, water quality, air quality, agriculture, climate change and quality of life. These impacts are described in greater detail below.

Washougal has five (5) at-grade crossings and only one grade-separated crossing. BNSF is single-track through Washougal, with a double siding (total three tracks) less than 100 yards east of the grade crossing at our 32nd St. Our primary arterial, Evergreen Way (the old Evergreen Highway) parallels the tracks just 50 yards to the north. That intersection, 32nd at Evergreen, is the busiest intersection in our city. Facts on the ground severely limit the storage space for stopped, crossing and turning, traffic at 32nd/Evergreen. So it seems likely that a heavily laden

train, west-bound from a dead stop in that siding would likely close that grade crossing for long time. Effectively closing not only the North/South grade crossing on 32nd, but also our primary East/West arterial with stopped cars. In our city, housing is predominately north of the tracks and the jobs are south of the tracks as is the Police Station and the Fire Station.

The economic, and public safety impacts, of cutting our city in half, at those crossings, are beyond our ability to evaluate and to mitigate. Nor should it be our responsibility.

Similarly the impacts on public health and welfare, are beyond our ability to evaluate or mitigate. We have concerns about noise, particulates and sulfur from the trains themselves, as well as the stalled automobile and truck traffic stalled at crossings. We can only imagine the potential impacts of coal and coal dust dropped or blown from the trains into our community, or into the Columbia River (Threatened and Endangered Species!) and the Columbia River Gorge National Scenic Area.

While we certainly support economic development by and for all of our communities in Washington, we certainly would require a broad analysis of net gains. For example, if a rail terminal would create 150 jobs at the terminal, but would effectively cost 300 jobs at a mill, because the rail traffic at-grade crossings effectively cuts truck traffic access to the mill, on balance, the rail terminal is a net loss. To put a fine point on it, neither Washougal, nor any other community should have to give up its larger economic future for small gains elsewhere. Any economic analysis of the Gateway Pacific Terminal, which fails to consider the economic impacts to the broader community fails in total.

Conclusion

The Gateway Pacific Terminal will have major impacts throughout the rail corridor. Washougal is hopeful (I, personally, would say, insistent.) that examination of impacts, and the mitigation required for those impacts will extend across the entire transportation route. Washougal City Council enacted a resolution this past spring enumerating many of our concerns, and asking that the City of Washougal be a party of interest, and that testimony be taken, locally, here in Clark County.

Thank you for your consideration,
Paul Greenlee
Council Member
City of Washougal, Washington