



11930 Cyrus Way – Mukilteo, WA 98275

December 7, 2013

Brig. Gen. John McMahon  
Commander and Division Engineer  
U.S. Army Corps of Engineers Northwestern Division  
P.O. Box 2870  
Portland, OR 97208-2870

U.S. Corps of Engineers Portland & Seattle Districts  
Department of Ecology  
Whatcom County

**Re: EIS Scoping for Proposed Gateway Pacific Terminal Project**

Proposed at Cherry Point, Whatcom County, Washington, Facility Site ID #22237

Dear Co-leads for NEPA & SEPA on the Proposed Gateway Pacific Terminal:

The City of Mukilteo has the following scoping issues to submit regarding the Gateway Pacific Terminal (GPT) Project being proposed by Pacific International Terminals, Inc., through SSA Marine, to develop a multi-user import and export marina terminal for bulk, break-bulk and other marine cargoes. This project is proposed to include rail terminal storage areas, and a pier. The rail traffic from the project is expected to lead to at least 9-18 additional trains per day travelling through the region, each of which is likely to be one mile in length. We already have two coal trains per day that impact our shorelines and railroad capacity. Railroad traffic has increased from 45 to 60 trains/day in the last three years. Adding additional trains could impact regional and interstate trains. This DEIS needs to cover air quality, noise, vibration, and infrastructure impacts.

BNSF now requires coal transport to use: surfactants/chemical binding; reduced load-top profiles; and coal cars to be cleaned before they are hauled back empty. These are steps in the right direction, but in this case where sensitive environments are involved, the cars may also need to be lined to ensure no dust leaks out from bottom bins.

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The cars should be fully covered and the coal profiles only be up to the sides of the tender cars. The Power River coal is very susceptible to pulverizing and creating fugitive dust both at the top of the load and at the bottom of the cars.

The City is also interested in knowing whether probable significant adverse impacts will occur within the City. Such impacts could include but are not limited to increased rail traffic, noise, vibration, and air quality impacts, impacts due to train idling, increased steep slope slides during the rainy season, and the impacts of reducing pedestrian and bicycle access to the waterfront across the railroad in the City. The Snohomish County Tomorrow Board also requested that the direct, indirect, and cumulative impacts of coal export on public health, public safety, economic, marine health, public investment, and climate change also be addressed in their November 2012 letter, and we agree.

More specifically, the City has concerns about how increases in rail traffic could impact air quality along our six miles of shoreline including increased diesel and coal dust emissions? The downtown waterfront area is planned for future redevelopment. Lighthouse Park is used during the summer by the Farmers' Market, Mukilteo Lighthouse Festival and an Arts Festival, and throughout the year when it is also used by residents and visitors. Impeded access to the waterfront area includes: Lighthouse Park, the Tank Farm areas and Washington State Ferry terminal. Train idling along the city's shoreline is also of concern, as this presently occurs over extended periods of 24-72 hours, thereby concentrating diesel fumes.

The Mount Baker Crossing will be re-opened and is signalized for a quiet zone. This signalized crossing is not listed as an at-grade crossing that should be studied related to traffic disruption. The Mt. Baker crossing also is associated with the Boeing rail spur and Rail Barge Transfer Facility. BNSF previously performed traffic counts and found that this crossing could not be closed (except temporarily) as it is also needed for emergency response. The Mount Baker Crossing and BNSF's Boeing Spur both need to be added to at-grade crossings impacted by the proposal.

There has been more attention in the last few years to the many slides that are occurring along the steep slopes of our waterfront. These slides impact rail traffic, and particularly impact the function of the Sound Transit commuter trains. The City has concerns that the heavy, frequent trains related to this project might have on our slope stability and the Sound Transit commuter rail and Cascadia and AMTRAK systems. The scope should cover alternative haul routes and evaluate whether the loaded-delivery routes should be limited to the inland Stevens Pass alignment, rather than the shoreline alignment. It should also consider having both loaded and unloaded trains be handled via Stevens Pass, rather than the Columbia River and shoreline route.

Protecting such interests and the safe transport of coal, oil and other hazardous goods must be covered by the State Environmental Policy Act (SEPA). As a jurisdiction along the BNSF Puget Sound shoreline corridor, it is foreseeable that

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without adequate scoping, investigation or mitigation (solutions to steep hillside slides have not been found); injury and derailments are likely to result.

Scoping of the Draft Environmental Impact Statement (DEIS) must include the direct, indirect, and cumulative impacts. As you know, lead agency(s) cannot limit consideration to those aspects within its jurisdiction, such as local and state boundaries. The U.S. Corps of Engineers is responsible for reviewing multiple coal terminals within the State of Washington and the connecting routes to other states and even into Canada. A "Programmatic EIS" would be more suitable for the broad cumulative impacts, but also needs to be available at the same time for complete review. To-date, there are six (6) potential rail terminal proposals or approximately 130 million tons/year that could be shipped. Cherry Point is projected to be the largest terminal. Chinook Salmon is just one species that will be impacted in the Columbia River and Puget Sound – Snohomish, Stillaquamish, Skagit and Whatcom Counties.

The City respectfully requests that any environmental review carefully consider in its scope the regional impacts of this proposal beyond Whatcom County, including direct, indirect and cumulative impacts to the City of Mukilteo. As part of the analysis, the City believes full consideration of alternatives as well as mitigation measures designed to alleviate the air quality, noise and vibration impacts, as well as, slope stability impacts and waterfront access impacts be addressed and also whether project financial mitigation is appropriate.

As a party with a known interest in this proposal, Mukilteo respectfully requests that all SEPA notifications be sent to the following when SEPA notification is required under your rules:

Heather McCartney, FAICP  
Community Development Director/SEPA Official  
City of Mukilteo  
11930 Cyrus Way  
Mukilteo, WA 98275

The City looks forward to providing constructive comments when the DEIS and Programmatic EIS have been made available for simultaneous review. If you have any questions, please do not hesitate to contact Heather McCartney, the City's Community Development Director at 425-263-8040; hmccartney@ci.mukilteo.wa.us

Sincerely,



Mayor Joe Marine

Cp: Mukilteo City Council  
Correspondence Files  
Project File  
EIS Co-leads