



Washington State Senate

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Ms. Alice Kelly
Northwest Regional Office, Department of Ecology

Mr. Randel Perry
U.S. Army Corps of Engineers, Regulatory Branch
Northwest Field Office

Mr. Tyler Schroeder
Planning and Development Services, Whatcom County
360-676-6907 ext. 50202

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

Re: NEPA & SEPA Scoping Comments on Gateway Pacific Terminal Project

Dear Ms. Kelly, Mr. Perry & Mr. Schroeder:

This letter provides scoping comments to the co-lead agencies responsible for preparing the environmental impact statement (EIS) for the Gateway Pacific Terminal (GPT) project and associated Custer Spur rail improvements at Cherry Point in Whatcom County. The proposed project will have the capacity to handle up to 54 million tons per year of bulk commodities, of which as much as 48 million tons may be coal that is mined in the Powder River Basin in Wyoming and Montana, and are exported for consumption in Asian markets. All of this material will be transported by rail along existing lines in Western Washington which in several locations will intersect routes that are integral to a very important component of the state's highways: the Washington State Ferry System. While there are a host of other impacts from this proposal on our communities, regionally, nationally, and indeed globally, this letter is confined to the impacts upon the ferry system and the communities that are dependent upon it.

For example, the main BNSF line, likely to be used for transport of coal from the Powder River Basin to the GPT facility is immediately adjacent to the ferry terminal in the City of Edmonds in Snohomish County. This terminal is a link to Washington State Highway Route 104, which is a formally designated "highway of statewide significance." This highway crosses the BNSF main line at an at-grade crossing, and initial analyses by the City indicate that the anticipated increase of as many as 18 trains per day – each up to 1 ½ miles long – would greatly increase delays in loading and unloading of ferry vessels. These impacts have been confirmed in independent analyses, including one prepared for the City by Gibson Traffic Consultants (<http://www.coaltrainfacts.org/docs/Cherry-Point-Coal-GTC-Edmonds-Final.pdf>.)

This dramatic increase in rail traffic will disrupt ferry service with significant impacts on residents, businesses and the West Sound communities that rely on this crossing. In addition to the ferry system disruption from increased rail traffic, it is important that the EIS analyze associated economic impacts if the Kingston-Edwards ferry route were to become unusable due to rail traffic.

The BNSF line runs along or near much of the eastern shores of Puget Sound, where ferry terminal ingress and egress crosses the rail lines. While other major routes may have grade separation, it is important that the EIS fully analyze the need for rail infrastructure alterations to ensure that these longer, heavier trains do not compromise this infrastructure.

The EIS should fully analyze how the costs for any infrastructure improvements that would be needed to mitigate impacts will be paid for, and who will pay for them. In the case of SR 104 and Edmonds, the EIS should include a specific analysis of the potential need for grade separation and relocation of the current ferry terminal. The Washington State Department of Transportation prepared an EIS in 2005 for a proposal to relocate the ferry terminal and allow grade separation, but this proposal has not moved forward due to the lack of dedicated funding. The EIS should analyze the likelihood that the proposed GPT project, if completed, would make relocation of the Edmonds ferry terminal necessary and should identify which entities would provide funding for this mitigation.

Thank you for including these comments into the public record for EIS scoping on the PGT project, and I look forward to reviewing a draft EIS that includes a full analysis of the project's potential impacts upon the state ferry system and SR 104 in Edmonds.

Sincerely,



Senator Christine Rolfes
23rd Legislative District