



United States
Department of
Agriculture

Forest
Service

Columbia
River Gorge
National Scenic Area

902 Wasco Street,
Suite 200
Hood River, OR 97031
541-308-1700

File Code: 1900

Date: January 14, 2013

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

To Whom It May Concern,

The USDA Forest Service appreciates the opportunity to provide comments on the proposed Gateway Pacific Terminal/Custer Spur EIS, during the scoping phase of the EIS.

Our understanding of the project is as follows. Pacific International Terminals, Inc. is proposing to build a deep-water, multimodal terminal in Whatcom County, WA. The primary purpose of the terminal is to export and import multiple dry bulk commodities, including but not limited to coal, grain products, potash, and calcined petroleum coke. The terminal will include two materials handling and storage areas, a wharf, and access trestle. As a connected action, BNSF Railway has submitted an application to modify the Custer Spur which extends to the industrial areas of the Cherry Point Industrial Urban Growth Area. With regards to the coal commodity, at full capacity, the project is expected to increase regional rail traffic by 18 coal trains/day (9 arriving and 9 leaving), each approximately 1.5 miles long. The trains will travel on BNSF owned railroad tracks. The trains will originate from the coal mines of Wyoming, travel through Spokane, WA; and then continue through three possible routes: (1) through the Columbia River Gorge National Scenic Areas, (2) over Stevens Pass, and/or (3) over Stampede Pass. The trains will return via one of these routes, but not necessarily the same route.

The project is currently in the scoping phase of the EIS. All agencies and the public have an opportunity to provide input about the following:

- Probable impacts that should be considered in the Environmental Impact Statement (EIS),
- Suggested methods of analysis that should be used,
- Minimizations and mitigations measures that may reduce or eliminate the adverse impacts, and
- Suggested alternative to the proposal that should be considered,

The Forest Service is concerned with impacts associated with the trains as they travel through public lands managed by the Forest Service. Based upon the 2009 Washington State Rail System map (attached), the BNSF trains would pass through one or more of the following lands managed by the Forest Service: the Okanogan-Wenatchee National Forest, the Mt. Baker-Snoqualmie National Forest, and Columbia River Gorge National Scenic Area. The Forest Service is concerned about new fire starts, air quality impacts, invasive species and noise.



The increase in rail traffic will increase the probability of new fire starts and wildfires. Over the past ten years the Columbia River Gorge National Scenic Area has responded to 61 fires that have started on or near the railroad tracks. The fires can result from sparks emitted from rail grinding and welding activities, railcar brakes, and engine turbochargers. During dry and windy conditions the sparks can be blown for some distance causing fires both within and far beyond the immediate track area. It is our understanding that within the Columbia River Gorge, currently the vast majority of the grinding and welding happens outside of fire season. However, should additional rail traffic occur, as proposed, this would most likely lead to additional grinding and welding during fire season. The Forest Service would like the project proponent to conduct track maintenance activities outside of fire season (which is typically June through mid-October), as a means of minimizing new fire starts.

When initial fire starts occur on lands managed by the Forest Service, the agency dedicates its resources toward initial attack to suppress these fires. This not only adds burden to the human and financial resources of the agency, but also increases the risk to human life, wildlife, and property. Additionally, wildfires emit air pollutants including the release of smoke and greenhouse gases, both of which have potentially harmful direct or indirect effects.

Air quality is also a concern. Fugitive emissions of coal dust or other dry bulk commodities may occur from railroad cars as they pass through National Forest System lands. These emissions may result in reduced visibility and increased concentrations of particulate matter. The Columbia River Gorge Air Study and Strategy¹ (September 15, 2011) has a goal of continued improvement in visibility. Please describe how this project will be consistent with the goals of this strategy. Deposition of coal dust emitted may also pose unacceptable risk to the ecosystem depending upon the type of constituents and amount deposited. The Forest Service would like the project proponent to consider covering rail cars to reduce fugitive dust emissions as they pass through the CRGNSA.

Invasive species are an ongoing issue in the CRGNSA and are a concern with increased rail traffic and maintenance. Vegetation control measures should be designed in consultation with the Forest Service to ensure invasive species are not promoted from vegetation removal. Please identify potential mitigation measures which may be used to minimize the impacts from invasive species in the CRGNSA.

Noise is also a concern as increased frequency and magnitude may negatively affect the recreation experience in the CRGNSA. Please identify potential mitigation measures which may be used to minimize noise impacts in the CRGNSA.

¹ http://www.deq.state.or.us/aq/gorgeair/docs/11aq035_gorgeAirStudy.pdf



United States
Department of
Agriculture

Forest
Service

Columbia
River Gorge
National Scenic Area

902 Wasco Street,
Suite 200
Hood River, OR 97031
541-308-1700

We appreciate your consideration of these comments. Please direct any questions to Ms. Christine Plourde, Landscape Architect for the Columbia River Gorge National Scenic Area at 541-308-1713 or at cplourde@fs.fed.us.

Sincerely,

LYNN BURDITT
Area Manager
Columbia River Gorge National Scenic Area

Enclosure (BNSF rail routes in Washington)