
January 22, 2013

Gateway Pacific Terminal
Custer Spur EIS
c/o CH2M HILL
1100 112th Avenue NE, Suite 400
Bellevue, Washington 98004

RE: **Gateway Pacific Terminal Custer Spur EIS**
EIS Scoping Comment
Via e-mail to comments@eisgatewaypacificwa.gov

Dear Army Corps of Engineers, Department of Ecology and Whatcom County Council,

This letter is to provide comments on the proposed scoping of the Environmental Impact Statement (EIS) for the Gateway Pacific Terminal. Please consider this to also be a request to be established as a party of record to this proceeding.

The proposed Gateway Pacific Terminal and increase in long coal trains may have a detrimental impact on the communities along the rail line; especially, Bellingham. There are many crossings that the long coal trains must use that will impact pedestrians, bicyclists, transit, emergency and commercial vehicles.

As part of the EIS, we believe these crossings must be adequately studied to show the potential negative impact the projected increase in lengthy trains will have on the community as compared to a baseline that reflects conditions over the past ten years as compared to the next twenty years.

The Gateway Pacific Terminal is a major development under the Whatcom County Code. The County must conduct "special review of those projects or developments that because of their magnitude and impact will tend to affect the public at large." This "special review" must include careful scrutiny of the terminal's impacts on essential facilities including the rail line that runs through Bellingham.

Rail service is essential for the terminal. The County has a responsibility to ensure adequate capacity exists, even for infrastructure like private rail lines. The County identifies rail service as a critical part of the County's transportation system in the County Comprehensive Plan.

Whatcom County's transportation system is a network of facilities – highways, streets, roads, rail, marine, airports, bikeways, ferry terminals, trails, paths and many other facilities. According to the County Comprehensive Plan in Chapter 6, the transportation system is a link among land use patterns, population growth, economic opportunities, energy consumption, environmental stress, and other facets of Whatcom County growth. The Growth Management Act requires the County to plan for the future of both network and linkage aspects of the transportation system.

The Gateway Pacific Terminal will impose uncompensated requirements for public expenditures on the City of Bellingham and Whatcom County to mitigate the effects of additional rail traffic. The scoping of the EIS should include the total capital and operating costs of these expenditures over a twenty year period.

The project description is incomplete without a specific proposal for increasing rail capacity between Bow and the Custer Spur. The problem is that only one track runs between Bow and Ferndale. This means that only one train can run the entire stretch at a time. At any time, a train must have exclusive occupancy of the track on which it is located as well as the track in front of the train that is within stopping distance. Thus, it may be necessary for a train to have exclusive right to several miles of track at any time. The impacts of introducing any mitigation to this constraint must be included in the EIS and rigorously examined including the potential of double-tracks through Bellingham.

The terminal's developer submitted a project information document relying on it to meet the County's requirements for a major project permit. The project information document addressed the question of railroad capacity. The developer disclosed that the terminal will generate 18 additional train trips along the Bow to Ferndale segment each day. Most trains serving the terminal are anticipated to be 8,500 feet long. There is not adequate capacity to satisfy these conditions. The railroad corridor through Bellingham is already operating at or near capacity. The EIS scope must answer the question: How will the increase in lengthy coal trains impact the potential for increased passenger train service which is a dynamic part of the County's transportation system?

The scoping for the EIS must include a full disclosure of all plans necessary to provide sufficient rail capacity using all applicable definitions and plans that have been adopted by the States, Counties and Cities through which these operations will pass. The terminal's developers and Burlington Northern must disclose all plans for a south Bellingham siding and all alternative rail infrastructure intentions before Whatcom County can adequately examine the environmental and community impacts from the proposed terminal.

The terminal's developers and Burlington Northern must reveal through the scoping of the EIS exactly how rail traffic will be routed and operated through Whatcom County. This must be a core section of the EIS to fully analysis the impacts of this project. All infrastructure required to address the requisite near doubling of the current

rail line's capacity needs to be addressed in the scoping of the EIS. These characteristics should include the full range of anticipated train speeds that have been observed over the past ten years operating through the City of Bellingham.

All rail operating possibilities should be analyzed in the EIS for their impacts on all other modes of transportation at all grade crossings within the City of Bellingham. This should be done in the EIS using the most recent traffic engineering practices including those embodied by the 2010 Highway Capacity Manual and the use of 4-mode level of service calculations where each mode is given equal weight for vehicles, pedestrians, bicycles and transit. The visual impact of rail and multi-modal conflicts at all grade crossings in the City of Bellingham must be illustrated using visualization capabilities now available through transportation engineering software programs such as VISSUM.

Thank you for the opportunity to offer our comments on how the EIS should be conducted.

Sincerely,



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