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COMMUNITY DEVELOPMENT DIRECTOR

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December 17, 2012

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

Col. John Eisenhower  
Commander, Portland District  
U.S. Army Corp of Engineers  
PO Box 2946  
Portland, OR 97208-2946

Col. Bruce Estok  
Commander, Seattle District  
U.S. Army Corps of Engineers  
PO Box 3755  
Seattle, WA 98124-3755

Dear Brig. Gen. McMahon, Col. Eisenhower, and Col. Estok:

The City of Marysville submits this letter as our scoping comments for the Gateway Terminal coal export project proposed at Cherry Point, Whatcom County, Washington, facility site ID #22237. The City of Marysville with a population of approximately 61,360 is located in Snohomish County Washington. Snohomish County, together with King, Pierce, Whatcom, and Skagit Counties comprise the areas expected to be most adversely impacted by the proposed project as they are the most densely populated, intensely improved, and therefore, potentially the most affected metropolitan and urban areas along the route. Additionally, Marysville is located north of Everett where rail traffic is expected to be greater than south of Everett due to fact that empty coal trains are expected to return easterly through the Cascade Tunnel rather than utilize the same route and return through the Stampeded Pass Tunnel. The City respectfully requests that the U.S. Army Corp of Engineers, Washington State Department of Ecology, and Whatcom

County (collectively ‘the lead agencies’) fully disclose and carefully assess the impacts of the Gateway Pacific Terminal (GPT) on Marysville, other communities, and the broader region.

### **Public Investment and Transportation**

Pacific International Terminals, a subsidiary of SSA Marine, proposes to export 48 million metric tons of coal annually. We understand that the number of trains expected to transport coal to the GPT site could force many major railways to operate at or above capacity. The BNSF’s main rail line runs north/south through Marysville and bisects portions of the City’s commercial/industrial/residential districts. Marysville, as the second largest city in Snohomish County currently has eleven public at grade crossings and nine private crossings and does not have any grade-separated crossings for major access. Motor vehicle congestion resulting from at-grade crossings and rail traffic is already highly problematic at several of the major arterial crossings in the City. The congestion that may be caused by additional trains could result in significant impacts on a number of key city streets as well as state and federal highways. For example, a terrible scenario for the city would be having all I-5 entrances blocked at the same time, i.e. SR 528, 88<sup>th</sup> St NE and 116<sup>th</sup> St NE. Preliminary traffic analyses have already been done for Marysville, Burlington, Mt Vernon, Stanwood, and Edmonds. These studies show the potential for severe impacts in communities from the dramatic increase in rail traffic intensity associated with GPT.

Furthermore, the public cost to develop capital projects that would separate these at-grade crossings threatens to divert precious public transportation resources that are programmed for existing needs. As a result, according to much of the analysis identified to date, many upgrades are probable, and we encourage the agencies to carefully examine:

- Where rail infrastructure improvements would be likely to occur.
- The sources of funding of such proposed improvements.
- The incremental impact of needed rail improvements necessitated partially or entirely by the addition of GPT-bound coal trains over the life of the project’s capital infrastructure needs.
- The increased costs of rail maintenance necessitated by the additional rail traffic.
- The share of these costs borne by the public at the local, regional, and state level should be noted so a full accounting of transportation externalities can be accurately identified.
- The cost of mitigation measures, such as additional overpasses, tunnels, crossings, and diversions, that additional rail traffic will likely motivate, especially relative to economic impacts.
- The location of necessary or probable mitigation projects, as well as the portion of the cost contributed by the federal government.

Additionally, recent capacity improvements may also be negated. For example, the city completed improvements at 116<sup>th</sup> St NE to ease congestion. It appears that the benefits gained with this improvement will be completely negated due to increased rail traffic. Impacts such as these should also be assessed and compensation and/or adequate mitigation provided to the city as well as other jurisdictions within the region.

## **Public Safety Impacts**

The safety of residents and businesses in our community is our highest priority. Potential adverse impacts from proposed increases to rail traffic include an increased risk of accidents, impacts to the city's level of service, decreased ability to provide effective emergency response times. The EIS should analyze:

- The impact of increased train traffic on the rate of vehicular accidents and the projected increase in train-related fatalities.
- The projected increase in coal train derailments due to the large increase in coal train traffic, and the emergency response capabilities to address derailments within Marysville, other local jurisdictions, the state, and the region as a whole.
- The actual travel time delays at specific intersections in Marysville, including but not limited to SR 528, 88<sup>th</sup> St NE, 116<sup>th</sup> St NE, and SR 531, and the economic and environmental impacts of these delays.
- The impact of increased coal train traffic on access to emergency services, including fire, police, and EMT services.

## **Economic Impacts**

A strong economy is vital to Marysville's well-being. The city is concerned that existing properties would be compromised and/or businesses lost in order to accommodate coal traffic. Increased delays at city rail crossings and on I-5, waterfront accessibility issues, and increased noise and pollution would likely impact local jobs and businesses. Mitigating the disruption to the flow of traffic would require the building of over- and underpasses, which would, in themselves, cause disruption to local commerce. It is unclear who would pay for mitigation; these costs are typically borne, in large part, by taxpayers. Rail corridor communities outside of Whatcom County, such as Marysville will experience negative economic impacts without guarantee of any potential economic benefits (i.e. tax revenue from the terminal, the permanent employment of 44 terminal operators).

Both single- and multi-family residences have the potential to be negatively influenced by increased rail traffic. Marysville has both single-family and multi-family developments that face the rail line. Also, due to the city's topography sound waves from train noise travels throughout the city. Obviously, units facing the tracks are more influenced by the noise, vibration and pollution factors, while those further away experience noise and pollution to a lesser extent. Single-family residences are generally acknowledged as the most sensitive property type, as the consequential impacts can be perceived as having the capacity to directly influence the quality of life of the occupant(s), as well as negatively impact property values. For example the train's signal horn, which typically repeated blown prior to at grade crossings, is generally acknowledged as one of the loudest noises produced by trains, and is the primary negative externality generated by train traffic. Relocation for single-family home owners also represents a substantial barrier to changing their situation vs. apartment dwellers which have the ability to be more transient and relocate if ambient conditions do not meet their preferences. Condominium owners are more like single-family residential owners in that relocation is more difficult due to ownership/property value issues.

## **Public Health**

Coal is commonly transported in open-top rail cars, contaminating local air quality, infrastructure, streams and rivers with coal dust, chunks of coal, and diesel pollution. The EIS must take a hard look at the impacts of coal export, including:

- The public health impacts of increased air pollution from coal dust, which contains heavy metals, including mercury, arsenic, lead and uranium. Exposure to these toxins is linked to a multitude of health problems, such as cancers, neurological diseases, and birth defects. It is unknown if and to what extent these heavy metals might leach out from the coal and/or fugitive coal dust, from the train cars and at the terminal storage site, into local water supplies and into the marine environment. There are potential implications for the safety of the water we drink and the seafood we eat.
- Public health impacts from increased noise and vibration from large freight trains, which are associated with negative impacts on psychological health.
- Public health impacts associated with diesel emissions and other pollutants from coal trains.
- In addressing the impacts of coal dust and diesel pollution, the EIS should specifically analyze the potential rise of respiratory problems among children, the elderly, and other vulnerable members of our communities.
- Public health impacts from increased car emissions caused by traffic delays from coal trains.

*Whatcom Docs*, a group representing over 180 local physicians, and an increasing number of health care providers from the Pacific Northwest (Skagit, Snohomish, King, and Thurston counties; Oregon) are calling for a *Health Impact Assessment (HIA)*. While few specific mandates or resources exist for conducting HIA its use is increasing and recently has been included in state legislation to fulfill regulatory requirements. For example, Washington state required an HIA be performed to inform mitigation planning for the State Route 520 Bridge in Seattle to analyze effects on air pollution exposure. Realizing the benefits of HIA, the City of Marysville joins in advocating its analysis be integrated with or part of the EIS process.

## **Climate Change**

Burning coal leads to increased emissions of greenhouse gases and climate change. In turn, the EIS must assess the negative impacts to quality of life, public health, and the environment which are associated with climate change. This includes the impacts of climate change in Marysville and surrounding communities; ocean acidification; increased likelihood of reduced snowpack; flooding; summer droughts; forest fire risk; and quality of coastal and near-shore habitat.

## **Cumulative Impacts**

The lead agencies must assess the cumulative impacts of the Gateway Pacific project and existing rail traffic, as well as projected increases in rail traffic from other coal export proposals through a Programmatic EIS (PEIS). Currently, five ports are considering coal export proposals, which, together, could transport more than 140 million tons of coal through the region. For example, the lead agencies must assess the cumulative impacts resulting from the emissions of greenhouse

gasses that would result from the proposed combustion, mining and transportation of coal that would be handled by the proposed coal export facility at Cherry Point. In doing so, the lead agencies must assess the totality of greenhouse gas emissions associated with all of the coal export facilities that are currently proposed for the West Coast.

Each individual port terminal project creates local impacts on the environment and immediate community that should be evaluated in a project-specific EIS for each site. In addition to project-specific EISs appropriate for each terminal site, we are asking you to conduct a PEIS on those environmental and economic effects of the various projects that are similar, connected or cumulative. These shared impacts include rail traffic and emissions; ocean-going vessel traffic and emissions; increased mining; national coal supply and pricing; and air-borne mercury deposition in the Northwest and GHG emissions associated with increased combustion of coal.

The USACE may look at cumulative impacts as required by the National Environmental Policy Act (NEPA), however, USACE has no authority over interstate railroad movements. The U.S. Surface Transportation Board (STB) is an economic regulatory agency that Congress has charged with resolving railroad rate and service disputes and reviewing proposed railroad mergers. The STB has often been involved in cases which involved mitigation resulting from increased railroad traffic levels and has been involved in several cases involving the proposed expansion of PRB coal movements. Previous other potential expansions of railroad PRB coal movements have also been under the jurisdiction of, and the subject of approval by, the STB, namely:

- **DM&E** – The application filed by the Dakota, Minnesota & Eastern Railroad Corporation (DM&E) to construct and operate 280 miles of new rail line and the rehabilitation of approximately 600 miles of existing rail line in Wyoming, South Dakota, and Minnesota; and
- **TRRC** – The Tongue River Railroad Company (TRRC), which involves the construction of an 89-mile coal line from Ashland, MT to Miles City, MT.

Here, the size of the railroad track construction and expansion of the PNW export terminals may be smaller in comparison to the DM&E and TRRC PRB build-in proposals, but the overall impacts will be much broader and more adverse to the areas along the over 4,000 miles of impacted rail route. The City of Marysville promotes a full STB environmental review of the effect of exporting PRB coal via PNW ports and/or Federal legislation which would require STB approval for such increase in traffic levels or extensive infrastructure improvements.

### **Alternatives Analysis**

We urge the lead agencies to complete a thorough analysis of alternatives to coal export at Cherry Point, including export of other commodities, the use of the property by other industries, and a ‘no action’ alternative.

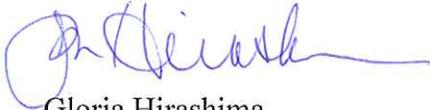
### **Conclusion**

The proposed coal export projects in the Northwest present unprecedented threats to our communities. The City joins with other communities and regions located between the coal mines

in the Powder River Basin and the export terminals in Oregon and Washington and urge the lead agencies to prepare an exhaustive, expansive EIS which accounts for the wide range of direct, indirect, and reasonably foreseeable impacts from coal export in the Pacific Northwest.

Thank you for your consideration in these matters. I can be reached Monday through Friday, 7:30 am to 5:00 pm at (360) 363-8088 or by e-mail at [ghirashima@marysvillewa.gov](mailto:ghirashima@marysvillewa.gov).

Sincerely,



Gloria Hirashima  
Chief Administrative Officer/Community Development Director

cc: Jon Nehring, Mayor  
Marysville City Council