



December 12, 2012

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

Re: Proposed Gateway Pacific Terminal Project

Dear Sir or Madam:

The City of Mount Vernon ("the City") is closely following the Gateway Pacific Terminal (GPT) Project proposed by Pacific International Terminals, Inc., through SSA Marine which includes the development of a multi-user import and export marina terminal for bulk, break-bulk, and other marine cargoes and the Burlington Northern Santa Fe (BNSF) Railway's Custer Spur Rail Expansion project ("the GPT Project"). This letter is intended to serve as the City of Mount Vernon's scoping comments for the GPT Environmental Impact Statement and is submitted to you on behalf of the Mayor of the City of Mount Vernon and the Mount Vernon City Council.

The City contains within its jurisdictional boundaries the BNSF rail line. This rail line has eight at-grade railroad crossings located within the City (two of which cross heavily traveled state routes; **Exhibit A**), one just east of College Way and Riverside Drive, the busiest intersection in the County, and another at Kincaid Street which is at the entrance to Mount Vernon's historic downtown and the location of the County Courthouse, Jail and City Hall. As explained below, it is expected this rail line, including at-grade crossings, will be utilized to serve the Project.

The City is required to prepare, manage, and expend substantial funds and resources when an emergency presents itself. To that end, the City operates both a police department and a fire department that provides emergency medical services both within the City and outlying areas in the event mutual aid is required. A regional hospital district, Skagit Public Hospital District One, is located within the City. In addition, Mount Vernon is located along the banks of the Skagit River. There is a substantial and well-documented risk of flooding. River flooding has the potential to cripple key infrastructure, transportation, water, residential areas, and farmland as well as injure life and property. Thus, Mount Vernon not only provides public safety services needed to respond to typical emergency medical services but also provides resources, materials and volunteers all which need to be quickly mobilized along the Skagit River to assist in mitigation of river flooding. In the event flooding is imminent, for example a levee breach occurs; Mount Vernon's emergency plan includes evacuation of citizenry to higher ground. In such an event, time is critical.

The proposed GPT Project would handle import and export of up to 54 million dry metric tons per year of bulk commodities- mostly coal. The project at Cherry Point, if approved, would result in North America's largest coal export facility and the estimate of an addition of eighteen, mile and-a-half long coal trains daily. It is reasonably foreseeable this will create significant delays at at-grade crossings, inhibiting the travel of emergency vehicles, traffic delays and congestion (**Exhibit B**), and endangering pedestrians. Because the proposed project will have off-site impacts, namely the transport of commodities along BNSF rail lines which run through the City of Mount Vernon, the City has clear standing and vested interest in the review process.

The Mount Vernon City Council and Mayor are greatly concerned that the additional rail traffic, proposed by GPT, will result in safety and mobility impacts within the City's most heavily traveled transportation corridors. Traffic delays and congestion have a direct economic impact that will negatively impede business development and investment at a time when the City is removing such obstacles in order to promote economic development. The City spent a great deal of effort and capital on the revitalization of its downtown and envisions significant redevelopment over the next 5-10 years. However, should vehicular and non-motorized travel be impeded as a result of lengthy delays at rail crossings resulting from increased train traffic, this will cause a significant reversal to adopted redevelopment plans for the downtown.

Based on the aforementioned concerns, the City respectfully requests that the EIS carefully consider in its scope the regional impacts of this proposal beyond Whatcom County including impacts to the City of Mount Vernon. As part of the analysis, the City believes full consideration of alternatives as well as mitigation measures designed to alleviate the conflicts between rail traffic and our system of roadways are in order.

As you are aware, lead agency(s) cannot limit consideration to those aspects within its jurisdiction, such as local and state boundaries. When determining the scope and agency must include in their review related connected actions and cumulative actions which when viewed with other proposed actions have cumulatively significant impacts. It is clear on its face that completion of the GPT Project will inevitably and automatically trigger an increased commitment of rail resources, more particularly, an increase in rail freight traffic. Such related connected and cumulative actions must be considered within the scope of your EIS. To fully understand such impacts to the City, the following is requested:

- An examination of the amount and character of travel upon all crossings within Mount Vernon and all dangers proposed by increased delays to such crossings. The amount and character includes use by the City, Skagit County, and all Fire Districts emergency responders for fire, police, and ambulance services for access to the residences and business in the area in response as mutual aid or primary roles as the case may be and the need to utilize such crossings to provide for evacuation of citizenry or mobilization and staging of resources during catastrophic events such as flooding.
- A complete evaluation and potential mitigation of the transportation impacts to at-grade rail crossings including delays to traffic and emergency response time and impacts to passenger rail traffic at full build out. Reasonable alternatives such as separation of the grade crossing or relocation need to be thoroughly explored.
- Analysis of the physical impacts, including increased wear and tear on rail/street crossings from additional freight traffic.
- Analysis of the economic impacts to businesses as a result of traffic congestion and delays resulting from at-grade crossings at Kincaid Street, Blackburn Road and College Way.
- Analyze noise impacts to residential uses along the rail line within the City limits and identify appropriate mitigation.
- Analysis of all pedestrian safety concerns.
 - *Please refer to **Exhibit A** for all at grade crossings to be examined for impacts and mitigation.*

It is imperative that any and all significant probable adverse environmental impacts must be considered including direct, indirect, cumulative and future impacts. Reasonable alternatives and mitigation must be considered. To that end, the City anticipates that the lead agencies will provide complete and comprehensive answers to questions relating to those impacts as well as the proponent's plans to mitigate those impacts, the timeframe for implementing measures to mitigate impacts and a financial plan that pays for mitigation measures without negatively burdening the local jurisdiction.

The Mount Vernon Council and Mayor request that all costs associated with mitigating the negative impacts associated with the proposed project shall not be borne by Mount Vernon or Skagit County residents.

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

Jana Hanson
Community and Economic Development Director/SEPA Official for the City
PO Box 809
910 Cleveland Avenue
Mount Vernon, WA 98273

The City looks forward to beginning constructive participation and providing further input in this matter. If you have any questions, please do not hesitate to contact Jana Hanson, the City's Community and Economic Development Director at 360-336-6214.

Sincerely,



Jill Boudreau, Mayor



Joe Lindquist, City Councilman – Ward 1



Mark Hulst City Councilman – Ward 2



Bob Fiedler, City Councilman – Ward 3



Dale Ragan
City Councilman – At Large



Kerr Quam, City Councilman – Ward 1

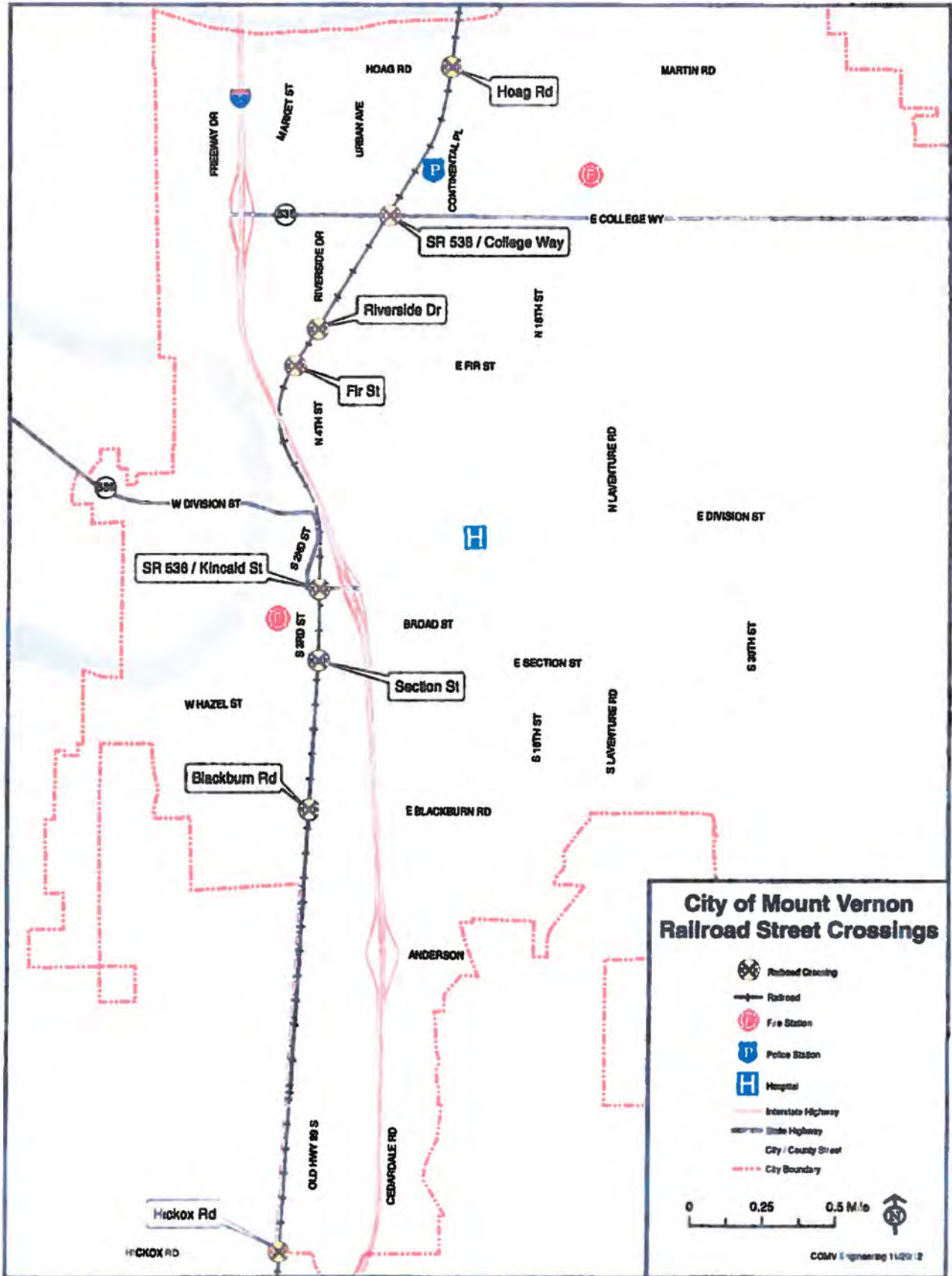


Gary Molenaar, City Councilman – Ward 2



Mike Urban, City Councilman – Ward 3

Exhibit A



LOCAL

Skagit Valley Herald

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News Desk: 360-416-2143 / news@skagitpublishing.com

Stalled train snarls traffic in Mount Vernon

Some see incident as glimpse of coal train troubles

By KATE MARTIN
Staff Writer

MOUNT VERNON — A Burlington Northern Santa Fe train stalled in the heart of Mount Vernon Thursday morning, snarling traffic along West Fir Street, Riverside Drive and College Way.

The train halted traffic for 45 minutes to an hour, said Mount Vernon Police Sgt. Peter Lindberg. The train was moved about 10:45 a.m.

BNSF spokesman Gus Melonas said mechanics inspected the train for what appeared to be a locked wheel.

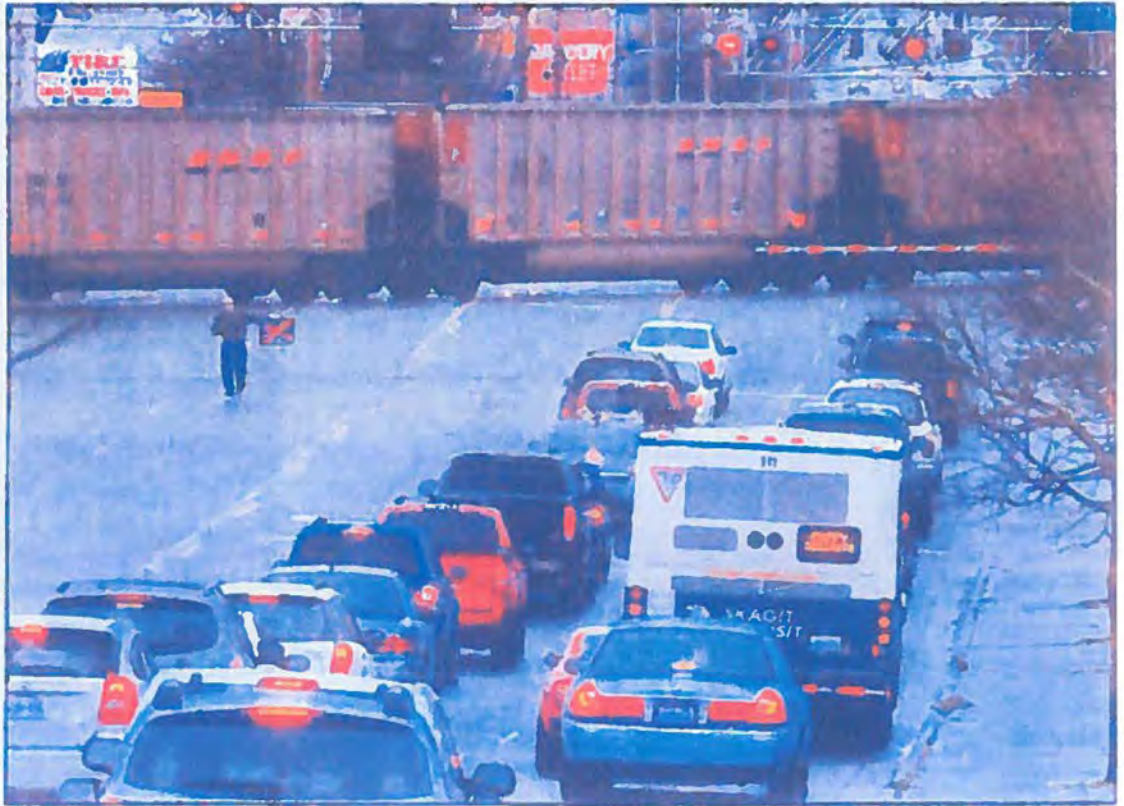
The engine was located beneath the Second Street viaduct, with the train cars to the north. Mount Vernon police say there were no injuries or traffic collisions reported.

"It didn't cause us a problem, but it had a potential to cause us a problem," said Mount Vernon Fire Department Chief Roy Hari.

He said his engines at Station 2 on LaVenture Road could only get to the other side of the railroad tracks by using the Second Street viaduct.

"If we have to go anywhere from there and it's blocking Kincaid, it makes it quite interesting to get around town if you have a train parked in the middle of the city," Hari said.

Lyle Gerrits, owner of Northwest Fine Furnishings on Riverside Drive, took advantage of the traffic jam



Scott Terrell / Skagit Valley Herald

A southbound Burlington Northern Santa Fe train blocks traffic along Riverside Drive Thursday morning in Mount Vernon. Lyle Gerrits, owner of Northwest Fine Furnishings on Riverside Drive, took advantage of the situation to break out the "No coal train" poster, protesting the proposed Gateway Pacific Terminal at Cherry Point north of Bellingham.

to wave a sign protesting the proposed Gateway Pacific Terminal in Bellingham. The terminal would export bulk commodities to Asia, including coal from America's Midwest, and bring as many as 18 additional trains through Mount Vernon and Burlington.

Gerrits met one of the terminal's supporters, who was sitting in traffic in front of his store. The man was upset at Gerrits' sign, which read

"Coal Train" with a red "X" symbol through the words.

"He said that means 800 jobs," Gerrits said. "Yeah, for the hospital, for doctors, for nurses, the car repair folks."

Gerrits said he also owns a farm in Blanchard that is within a quarter mile of the train tracks.

"I don't see what the benefits are," he said. "Temporary jobs and long-term consequences aren't good."

Skagit 911 Director Bill King said emergency dispatchers were aware of the trains blocking the intersections.

"We make sure that all of our user agencies are notified" when intersections are blocked, King said. "Knowing where they can go beforehand is usually a lot of help to them."

The 911 center attempts to figure out what is wrong with the train and a timeline

for its removal, as well as if there are any hazardous materials on board that first responders might need to know about, King said.

Skagit Transit buses also sat in the traffic jam for the duration. A notification on the agency's Twitter account posted at 10:30 a.m. said, "All Mount Vernon buses are stalled due to trains." A spokesman with the agency did not return calls seeking comment.