

Eron M. Berg
City Supervisor/Attorney

January 4, 2013

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

Re: Proposed Gateway Pacific Terminal Project

To Whom it May Concern:

The City of Sedro-Woolley (“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 Sedro-Woolley’s scoping comments for the GPT Environmental Impact Statement

The City contains within its jurisdictional boundaries the BNSF Sumas line. This rail line has five at-grade railroad crossings located within the City (one of which crosses a heavily traveled state route and another crosses the main entrance to downtown). Our city is also directly impacted by the at-grade crossings on the main line at SR 20 in Burlington and on Cook Road in unincorporated Skagit County. Additionally, the BNSF Skagit River bridge has been declared a public safety hazard by the Sedro-Woolley City Council due to its past failures and current jeopardy during any Skagit River high water events. As explained below, it is expected the main line, including at-grade crossings leading to Sedro-Woolley and the BNSF Skagit River Bridge, will be utilized to serve the Project. We are also expecting an increase in traffic on the Sumas line as a result of the increased utilization of the main line from this 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 in Skagit County Fire Protection District 8. The City also provides emergency services to other outlying areas in the event mutual aid is requested. A regional hospital, United General Hospital is located within the City. In addition, a portion of Sedro-Woolley is located along the banks of the Skagit River and a significant area of the City is expected to be impacted in flood events. There is a substantial and well-documented risk of flooding. It is also well known and documented that the BNSF Skagit River Bridge has had and could have a significant impact on the effects of any particular flood event including backing water up the River to the east and/or in a total failure scouring the River to the west causing catastrophic loss of life and property. We believe

additional freight traffic on this failed bridge could exacerbate the risks of another failure during high water events and specifically ask that the replacement of this bridge be included in the scope of the EIS for this project.

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. Because the proposed project will have off-site impacts, namely the transport of commodities along BNSF rail lines which directly impact the City of Sedro-Woolley, the City has clear standing and vested interest in the review process.

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

John Coleman, AICP
Planning Director/SEPA Official for the City
325 Metcalf Street
Sedro-Woolley, 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 me or Mr. Coleman.

Sincerely,

CITY OF SEDRO-WOOLLEY



Eron Berg