



SENT VIA ELECTRONIC MAIL

January 18, 2013

Colonel Anthony C. Funkhouser
Commander, NW Division
U.S. Army Corps of Engineers
PO Box 2870
Portland, OR 97208

Ms. Polly Zehm, Deputy Director
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504

Dear Colonel Funkhouser and Deputy Director Zehm:

The City of Bellevue staff has been following the proposal by Pacific International Terminals, Inc., a subsidiary of SSA Marine, to develop a marine terminal at Cherry Point in Whatcom County. As proposed, this "Gateway Pacific Terminal" would provide storage and handling for the export and import of as much as 50 million metric tons of commodities per year, primarily coal from the Powder River Basin of Wyoming and Montana. This represents approximately 4.6% of all the coal burned in the U.S. annually and perhaps more than 1% of the coal burned globally, so it will have very large impacts.

While the construction and long-term operation of the proposed Gateway Pacific Terminal is not expected to directly affect the City of Bellevue—the proposal is expected to utilize the BNSF rail facilities running along the Columbia River and up the I-5 corridor—there is nonetheless a possibility that BNSF might choose to utilize the existing rail corridor running through Bellevue should the initial route encounter permitting or other obstacles in the NEPA/SEPA analysis. As you conduct the alternatives analysis, we presume that the Woodinville Subdivision route that passes through Bellevue might be an alternative that would be considered. However, it should be noted that the rail line is incomplete given the adjudication by the Surface Transportation Board and subsequent removal of the Wilburton overpass, which presents substantial obstacles to getting coal further north from south Bellevue.

Further, alternative routes exist through less populated areas of the state that might prove to have fewer negative environmental, economic and transportation impacts and should be included in the NEPA/SEPA analysis.

Given the significant negative impacts of this proposal, I am requesting that your NEPA/SEPA review include an analysis of the impacts in the following areas:

Environmental Impacts

We concur with other local commenters that the NEPA/SEPA review process should account for the direct and indirect impacts resulting from construction and operation of the coal terminal and rail yard on sensitive aquatic and wetland habitats in the project vicinity. In addition, it must consider the direct, indirect and cumulative environmental and human impacts, including coal dust emissions and associated mercury and heavy metal pollutants on water quality, habitat and listed species throughout the route and the impacts to transportation, public safety, quality of life, human health and property values associated with the transport of coal through heavily populated urban corridors.

Quality of Life and Economic Impacts

Adding up to 18 trains per day, each one-and-a-half miles long, could result in significant current and future negative impacts to the economic health and quality of life in our region and our City. Impacts to public health and safety from coal dust and the associated mercury, heavy metals cannot help but greatly diminish the quality of life in our city and other communities impacted by their proximity to the terminal and rail line.

Many of our rail crossings are already chronically congested and this additional traffic would negatively impact existing capacity and mobility for the key industries that rely on these corridors to move their products. I encourage you to work with transportation, planning and economic development agencies in our area, as well as cities and counties along the rail corridor to thoroughly document baseline conditions and future plans for freight and passenger rail capacity along these rail corridors. A clear assessment of the impacts of the proposal on property values along the route, as well as the impacts on residential and commercial development, will be essential to accurately measure the impacts from the proposed coal terminal.

Traffic and Transportation Impacts

The addition of 18 mile-and-a-half long coal trains on the BNSF corridor has the very real potential to create significant delays at at-grade crossings in Bellevue, most notably the heavily travelled NE 8th Street corridor. NE 8th Street is the main connection into and out of downtown Bellevue and our Hospital District, which includes three major hospital facilities—Group Health, Overlake Hospital and Medical Center and Children’s Eastside. Any delay on this corridor will have a direct economic impact on downtown Bellevue as well as inhibiting emergency vehicle access to these healthcare facilities which will create an additional negative impact on public safety. The addition of miles-long coal trains would exacerbate the congestion at our rail crossings, and would create additional negative traffic impacts on adjacent streets and regional highway corridors as drivers seek alternate routes to avoid the congested rail crossings.

In addition, the new East Link Light Rail station serving the Hospital District will be located immediately north of NE 8th Street on the BNSF corridor. Coal trains in this area will put at risk the significant pedestrian population accessing and departing the light rail station. The EIS should analyze the economic and safety impacts of this new train traffic on other vehicular traffic (cars, trucks, emergency vehicles, transit and non-motorized uses) and estimate the cost of mitigating these impacts.

I appreciate the opportunity to convey our initial concerns to you on behalf of the City of Bellevue. Our City will continue to follow this issue closely and staff is available to share information on traffic, transit, economic development, health and environmental impacts that would accrue to the City of Bellevue as the NEPA/SEPA process for this project moves forward. If you have any questions or need additional information, please contact Joyce Nichols, Interim Intergovernmental Relations Director at 425-452-4225, or jnichols@bellevuewa.gov

Sincerely,



Steven R. Sarkozy, City Manager

cc: Bellevue City Council