



City of Stanwood

10220 270th Street NW
Stanwood, Washington 98292
(360) 629-2181

GPT/BNSF Custer Spur EIA Co-Lead Agencies
c/o CH2M HILL
1100 112th Ave N.E. Suite 400
Bellevue, WA 98004

Dear Sir or Madam;

This letter is a follow-up to the City of Stanwood letter of May 14, 2012 requesting Party of Record status regarding the proposed rail terminal project in Whatcom County (the Gateway Pacific Terminal Project, or GPT). The Burlington Northern Santa Fe (BNSF) main north/south track runs through and bisects Stanwood, and the proposed GPT project will significantly increase freight traffic on the BNSF track through the at-grade crossing at 271st St. that provides access to downtown Stanwood. The City has had input from local citizens and has developed further comments and requests for information to be included in the scope of the EIS.

The City requests that any environmental review carefully consider the regional impacts of this proposal beyond Whatcom County, including direct indirect and cumulative impacts to the City of Stanwood. As part of the analysis, the City believes full consideration of alternatives as well as mitigation measures to address Stanwood's identified concerns is in order.

Recent studies conducted by Gibson Traffic Consultants in the western Washington cities of Burlington, Marysville, Mt Vernon, and Stanwood identifies potentially severe vehicular traffic consequences due to the proposed increase in rail traffic intensity associated with GPT. Adverse effects to Stanwood and other cities include increased risk of accidents, impacts to the City's level of service, decreased ability to provide effective emergency response times, and possible interference with local truck freight delivery systems affecting the local economy. A memorandum by Edward Koltonowski of Gibson Traffic Consultants Inc. dated August 8, 2011 (enclosed) and presented to the City, identifies thirteen potential traffic impacts to the City. The City requests that these thirteen issues be incorporated into the EIS scope and that further information analysis, mitigation and alternatives be developed for each issue.

GPT has identified that full build out of the coal export facility would result in eighteen additional train trips through Stanwood per day; and eighteen trains per day would equate to approximately one additional coal train every 1.3 hours, all day long, in addition to existing train traffic. The City is aware that public safety could be threatened if response times for police and fire are increased due to critical access blockages caused by more frequent and

longer trains. Issues # 4, #5, and # 6 in the Gibson memorandum address this issue in greater detail. These issues are of significant concern to the City and its citizens.

In addition, the City has been made aware of potential impacts to air quality from diesel fumes, coal dust and other particulates that may be blown from open rail cars but has no way to evaluate such potential impacts.

The City requests that Whatcom County, Washington Department of Ecology and the United States Corp of Engineers include analysis of the impacts of this increased rail traffic and the impacts to air quality in the scope of the EIS and public hearings at the various stages of the EIS process. The City specifically requests that the following issues be analyzed and that appropriate mitigation and alternatives be identified.

- a. Increased traffic congestion and delays to residents and commerce including local freight delivery.
- b. Economic impacts to businesses in the Stanwood downtown as a result of traffic congestion, noise impacts, delays and the increased visual presence of trains in an area in immediate proximity to downtown.
- c. Economic impacts to residential properties located in proximity to the BNSF corridor, and in the Cedarhome Area above the tracks.
- d. Noise and vibration impacts to residential and commercial uses along the rail line within the city limits.
- e. Impacts to emergency services within Stanwood and in outlying areas including delays in service.
- f. Impacts to pedestrians using 271st St NW, Cedarhome Road and Florence Drive.
- g. Impacts to the municipal parking lot including limitations on potential future re-development of the parking lot for a mixed use project as anticipated in the Transit Overlay designation of the Stanwood Comprehensive Plan.
- h. Impacts to the rail corridor from potential flooding
- i. Delays and impacts to passenger service currently provided at the Stanwood Amtrak Station
- j. Analysis of physical impacts including increased wear and tear on the rail/street crossing at 271st St. NW.
- k. Impacts to air quality including diesel fumes and coal dust and other particulates that may be blown from open rail cars.

The City requests that the railroad provide representatives to meet periodically with local citizen groups and local government officials from Stanwood to seek mutually acceptable ways to address local concerns.

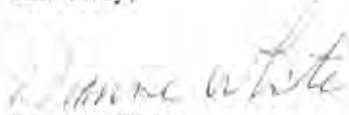
The City of Stanwood requests that the railroad identify road improvement plans for grading, widening, or otherwise providing a crossing at the 271st St NW/Cedarhome intersection that would be impacted by rail traffic increases and require the railroad to mitigate its impacts by funding the design and construction of upgrades.

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

Rebecca Lind
Community Development Director/SEPA Official for the City
10220 2780th Street NW
Stanwood, WA 98292

The City looks forward to participating in this review process. If you have any questions please contact Rebecca Lind, Community Development Director at 360629-4577; rebecca.lind@ci.stanwood.wa.us.

Sincerely,

A handwritten signature in cursive script that reads "Dianne White".

Dianne White
Mayor

cc: Stanwood City Council
Deborah Knight, City Administrator