



proud past, promising future

CLARK COUNTY
WASHINGTON

January 15, 2012

U.S. Army Corps of Engineers
Randel Perry, Seattle District Regulatory Branch
Care of GPT/BNSF Custer Spur EIS Co-Lead Agencies
1100 112th Ave. NE, Suite 400
Bellevue, WA 98004

Re: Clark County scoping comments for the proposed Gateway Pacific Terminals and Custer Spur Projects

Dear Designated SEPA Official:

Clark County respectfully asks to be made a party of record on the Gateway coal terminals project proposed in Whatcom County. If completed, this project could move 54 million tons of coal per year in up to 16 mile-long trains each day through Clark County communities. That could amount to 5,840 additional trains through our county annually.

Clark County supports projects that create jobs and provide a healthy economy locally and regionally. The county understands many new permanent and potentially thousands of temporary construction jobs are at stake. However, the Board of Clark County Commissioners cannot ignore the project's potentially significant, adverse impacts here.

The board is concerned about how rail traffic could harm the quality of life in Clark County, especially for those living and owning businesses near the rail lines. Impacts could include: emergency response delays; increased traffic congestion; air and noise pollution due to idling trains; air pollution created by coal dust; blocked pedestrian and bicycle access to the waterfront; destabilizing steep slopes adjacent to the tracks; changes to established and developing quiet zones.

Consideration of such interests is recognized by the State Environmental Policy Act (SEPA). As a jurisdiction on the Burlington Northern Sante Fe Railway corridor, the county wants to ensure the terminals project receives adequate scoping, investigation and mitigation to avoid injury to our county and citizens.

The board is encouraged that the U.S. Army Corps of Engineers, Whatcom County and Washington State Department of Ecology will be co-lead agencies for the project. Once the applicant properly defines the project, scoping the direct, indirect and cumulative impacts is required. As lead agencies, please ensure this review is not artificially limited by jurisdictional boundaries, but encompasses the full range of potential impacts.

Considering potential impacts in Clark County is crucial because, at the least, the cost of improving rail crossings to accommodate increased train traffic could be high, especially outside the immediate project impact area.

The county asks that an environmental review carefully consider the regional impacts of the proposal and that thorough consideration of alternatives and mitigation measures be included in the analysis.

As a party with a known interest in the proposal, we ask that all required SEPA notifications be sent to Axel Swanson, Senior Policy Analyst, P.O. Box 5000 Vancouver, WA 98666-5000.

Clark County looks forward to being a constructive partner and providing any comment needed throughout the process. If you have questions, please do not hesitate to contact Mr. Swanson at (360) 397-2232 or axel.swanson@clark.wa.gov.

Sincerely,



Steve Stuart, Chair
Board of Clark County Commissioners

cc: Alice Kelly, Washington State Department of Ecology
Tyler Schroeder, Whatcom County