



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

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November 28, 2012

Mr. Randel Perry
Regulatory Branch
Seattle District, Corps of Engineers
PO Box 3755
Seattle, Washington 98124-3755

Re: Gateway Pacific Terminal & Custer Spur Project
Log No: 092611-10-COE-S

Dear Mr. Perry:

We want to thank you and Ms. Jodi Ketelsen for providing the Agency Scoping NEPA/SEPA documents for the proposed Gateway Pacific Terminal & Custer Spur Project Modification in Washington.

We offer the following comments for consideration in developing the Environmental Impact Statement:

- We believe a robust cultural resources study effort is necessary given the known and potential archaeological, historic, and traditional cultural resources documented in the identified Study Area.
- We are supportive of the Agencies identification of Cultural Resources as a Topic in the List of Commitments.
- Given this recognition of the importance of cultural resources, we believe to effectively craft the contents of the Cultural Resources section, will require the agencies to implement a proactive consultation plan to assure all the affected communities are identified early and are offered an informed consultation regarding the cultural resources that are at risk and methods to avoid, minimize, or mitigate impacts.
- This especially includes the Rail Routes in Washington State identified in your presentation and the potential impact upon National Register listed or eligible historic districts, Main Street program communities, and those jurisdictions with local historic preservation programs (i.e. Certified Local Governments) that may have locally designated historic properties located along the routes and the potential socioeconomic impacts to these resources. This analysis should examine both short and long-term effects of the construction and operation of the rail routes upon the viability and livability of affected areas.



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- The scope of this project and the associated train traffic poses unique issues in developing the scope of the cultural resource studies including the need to address communities across the state that will witness changes in rail traffic including additional track right of way, spurs, and the associated impact from such train traffic including direct and indirect impacts such as vibration to historic structures, impact such as noise and traffic upon historic districts, and the impact to archaeological and historic properties due to accidents. This information will be critical in considering the development of the Area of Potential Effect (APE) for the Section 106 / National Historic Preservation Act compliance.
- We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,



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