

April 10, 2014

GPT/BNSF Custer Spur EIS Co-Lead Agencies  
c/o CH2MHill  
1100 112<sup>th</sup> Avenue NE, Suite 400  
Bellevue, WA 98004

**Re: Scoping for Rail Impacts, Gateway Pacific Terminal**

Dear Co-Lead Agencies:

We are writing to request that you compel the GPT project applicants, specifically SSA Marine under their obligation as an applicant for a Whatcom County Major Project Permit, to immediately disclose the specific train routes and traffic levels within Whatcom County. Without this fundamental information, the veracity of the local rail portion of the EIS may be in question.

The Administrative Draft EIS Scope of Work and its partner document, the GPT EIS Contract Information Document, were recently shared with the public, and we thank you for their publication. With their public sharing, we now have a growing body of documents issued by the Co-lead Agencies that define to various degrees the scope of work and aspects to be studied throughout the GPT EIS process including:

- The July 31, 2013 Joint Press Release: *Agencies set scope of environmental impact statement for proposed Cherry Point export project*;
- Gateway Pacific Terminal / Custer Spur EIS Phase 2- Administrative Draft EIS Development Scope of Work; and,
- The GPT EIS Contract Information Document.

All of the aforementioned documents make repeated assurances that the scope of rail impacts will be extended beyond the Custer Spur Improvements defined in the GPT Project Information Document. However, none of the documents describe with specificity the geographic scope for the SEPA analysis within Whatcom County or other areas in Washington State.

Although it has been over three years since SSA Marine first submitted the GPT Project Information Document, the applicant has still not disclosed the most basic information about this component of the project. To date, SSA Marine has not identified how and through what measures it will find capacity for 18 additional train trips within Whatcom County. It remains unclear as to whether the developers intend to utilize the main Bellingham Subdivision Route along the waterfront from Bow to Ferndale, the Eastern Whatcom County Farmland Route or a combination thereof. Yet the initial phases of the EIS studies are underway even though the project's exact rail impact area and corresponding traffic levels have not been disclosed.

Developing the precise geographic scope of analysis, now, at the beginning of the study phase, is imperative. Early in the process, Communitywise Bellingham and the City of Bellingham urged Whatcom County to ask the SSA Marine to disclose their rail transportation plans. As detailed in these previous communications, failure to precisely define the rail routes and the entire supporting infrastructure that would be employed to service GPT, leads to unnecessary ambiguity, a defective permit application and most importantly, a seriously flawed EIS.

Noise, vibration, air quality, at-grade crossing delays, land use impairments and many other important EIS studies will be compromised if the specific train routes and their corresponding range of GPT train traffic are not clearly identified and serve as the basis of these studies.

The absence of this fundamental train traffic and geographic data would indicate that the rail portion of GPT EIS is proceeding under a fundamental flawed methodology, calling into question any of the studies' potential findings—or lack thereof.

We urge the Co-Lead Agencies to require SSA Marine to disclose this basic project data, thereby correcting a fundamental information gap and permit defect. We also ask that this information be made available to the public immediately, as it directly affects communities along the rail corridors.

Thank you for your attention to this matter.

Sincerely,

Kim Lund, Project Director  
Communitywise Bellingham