



## GATEWAY PACIFIC TERMINAL DRAFT EIS CONTRACT SCOPE OF WORK

### INTRODUCTION

The Gateway Pacific Terminal (GPT) EIS process is currently being undertaken by Whatcom County. The EIS includes environmental review of two proposals, the Gateway Pacific Terminal initiated by Pacific International Terminals (PIT), and development of the Custer Spur, initiated by BNSF Railway. Recognizing that the proposals could have regional and statewide implications, Whatcom County asked the Washington State Department of Ecology (Ecology) to act as a State Environmental Policy Act (SEPA; Chapter 43.21C RCW, WAC 197-11) co-lead agency in managing the EIS process for issues that fall under Ecology's jurisdiction. The U.S. Army Corps of Engineers (Corps) was also asked to act as a co-lead agency to provide input on issues that fall under Federal jurisdiction. On initiation of the EIS process, Whatcom County, together with Ecology and the Corps, entered into a Memorandum of Understanding (MOU) that established and described the collaborative effort required for the EIS process. Each of the SEPA parties to the MOU has somewhat differing responsibilities; however, decisions as to EIS scope, content, and timing are joint and shared. The county maintains a webpage on the GPT project. The link to that site is here: <http://www.whatcomcounty.us/pds/plan/current/gpt-ssa/index.jsp>

### EIS CONTRACT

Whatcom County has entered into a contract with CH2M Hill to develop the EIS for the proposed Gateway Pacific Terminal project. The following is a discussion of the contracting phases, as well as the contract content, and is intended for informational purposes only. The SEPA Co-Lead Agencies will make SEPA-based decisions throughout the EIS process; these decisions may alter the course of the contracting phases provided here and may alter contract content at any time.

The GPT EIS process has been divided into discreet contracting phases:

- The initial contracting phase was for scoping
- The present phase is for development of the Draft EIS
- A future phase will be for development of the Final EIS.

While developing the present scope of work and contract, an additional contract phase for interim work toward completion of the Draft EIS was initiated and completed. Whatcom County has also entered into a cost reimbursement contract with the applicants (PIT and BNSF) for payment of all costs associated with CH2M Hill and County staff time.

### SCOPING PHASE CONTRACT

Under the scoping phase contract of the EIS process, Whatcom County issued a Determination of Significance (DS; WAC 197-11-360) after determining that the GPT proposal may have probable significant adverse environmental impact, and initiated a 120 day scoping period, inviting agencies, affected tribes, and the public to comment on the DS. Comments received during the scoping period were summarized in an

optional scoping comment report issued on March 29, 2013 and available at <http://www.eisgatewaypacificwa.gov/resources/scoping-report>. After issuance of the scoping summary report, Whatcom County and Ecology established the scope of analysis for the Draft EIS, as well as the geographic scope of analysis. All SEPA elements of the environment (WAC 197-11-444) will be included in the scope of analysis. These include: earth, air, water, plants and animals, energy and natural resources, environmental health, land and shoreline use, transportation, and public services and utilities as outlined in Attachment A. More detail on each environmental element is included in Attachment B. The information included in Attachment B is a starting point and will be refined throughout the development of the Draft EIS. These decisions will be made by the SEPA Co-Lead Agencies based on information gathered or data generated, and on comments received during the scoping period, consistent with SEPA.

### **INTERIM CONTRACT AMENDMENT**

A portion of the work described under the Draft EIS Development Contract Amendment was completed in the interim contracting phase. This contract amendment included work toward completion of project definition and purpose and need, early identification of the no action alternative, early identification of off-site alternatives for NEPA, and review and critique of applicant PIT's Project Information Document.

### **DRAFT EIS DEVELOPMENT CONTRACT AMENDMENT**

The present contracting phase is associated with a scope of work that outlines the steps involved in completion of the Draft EIS. These completion steps include:

- Defining the proposal
- Defining alternatives
- Analyzing the environmental setting encompassed within the development area of the proposal and that of alternatives
- Determining the impact to the environment if either the proposal or an alternative is implemented
- How to mitigate that impact or make it less severe.

The information gathered and developed in these steps will be incorporated into a single document, the Draft EIS, which is limited to 150 pages (WAC 197-11-425(4)).

The scope of work that supports the present contract amendment includes work required for both the SEPA process administered by Whatcom County and Ecology and the NEPA (National Environmental Policy Act) process administered by the Corps. Note that NEPA-specific scope of work items relevant to the Corps process, such as off-site alternative identification and maintenance of an administrative record, are not discussed here. These issues are discussed in the Memorandum for the Record (MFR) available at <http://www.nws.usace.army.mil/Portals/27/docs/regulatory/News/SCOPEMFRGATEWAYBNSF.pdf>. The scope of work also describes administrative tasks required to support development of the Draft EIS, such as project management; and public communications required for website management and notices for issuance of the Draft EIS. The Draft EIS development steps included in the present contract amendment are summarized in the following discussion.

### **PROJECT DEFINITION / PURPOSE AND NEED – DEFINING THE PROPOSAL**

This process step is discussed as Task 4 of the scope of work and includes describing and presenting the proposal. This section of the Draft EIS is largely refined from application materials submitted to Whatcom

County at initiation of the permitting process, and will be added to or amended if the applicants submit updates or changes to the proposals. Information will be tailored for a thorough understanding of all aspects of the proposals and will be included in Chapter 2 of the Draft EIS. A portion of development of the project definition was completed in the interim contracting phase; project definition work to be completed under this contract amendment is refinement of the interim contract amendment effort.

#### ALTERNATIVES DEVELOPMENT – DEFINING ALTERNATIVES

This process step is described in Task 5 of the scope of work. The SEPA rules require that alternatives be reasonable courses of action that could approximate a proposal's objectives on the project site, but at a lower environmental cost (WAC 197-11-440(5)(b)), and provides the intent that the term "reasonable" be used by the agency to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative (WAC 197-11-440(5)(b)(i)). The alternatives evaluation limitation to the project site is for private projects on specific sites per WAC 197-11-440(5)(d).

The SEPA Co-Lead agencies, upon initiation of the present scope of work, will begin identifying reasonable on-site alternative(s) for the PIT project site. If any alternative identified is deemed to be reasonable under SEPA, the alternative(s) will be reviewed in the Draft EIS. The scope of work associated with this contracting phase has assumed identification and review of one on-site alternative; identification of additional alternatives will require amendment of the present contract and associated scope of work. Upon execution of the present contract, PIT has stated that an alternative site plan will be submitted for consideration by Whatcom County. The degree to which the submitted alternative site plan meets the SEPA requirements for a reasonable on-site alternative will be determined after a thorough review by the SEPA Co-Lead Agencies. Once alternatives have been identified in the Draft EIS development process, identified alternatives will be appended to this document as Attachment C.

SEPA also requires review of the no-action alternative (WAC 197-11-440(5)(b)(ii)). The no action alternative is typically defined as what would be most likely to happen if the proposal did not occur. As part of this environmental review process, the no action alternative includes the project site in its undeveloped condition, along with existing land use entitlements. This means that the no action alternative will describe the site as it exists today, with the addition of 1997 land use approvals for an 8.2 million metric ton bulk commodity shipping terminal on 1,092 acres, including a wharf and trestle, and its regulatory implications. The existing, undeveloped site and the developed site pursuant to 1997 land use approvals will serve as benchmarks from which other identified alternatives will be compared.

#### RESOURCES ANALYSES – ANALYZING THE ENVIRONMENTAL SETTING, DETERMINING ENVIRONMENTAL IMPACTS, MITIGATING ENVIRONMENTAL IMPACTS

This process step is discussed in Task 6 of the scope of work. This step will include development of technical reports and technical memoranda for inclusion in Chapter 3 of the Draft EIS that will, as prescribed in WAC 197-11-440(6)(c):

- Succinctly describe the physical features of the environment that would be affected or created.
- Describe and discuss significant impacts that will narrow the range or degree of beneficial uses of the environment or pose long term risks to human health or the environment.
- Clearly indicate mitigation measures that could be implemented or might be required, as well as those that agencies or applicants are committed to implement.

- Summarize significant adverse impacts that cannot be mitigated.

The project site and surrounding area, as well as transportation corridors, will be examined fully under all applicable environmental elements (WAC 197-11-444) as they relate to the proposal for transportation and storage of dry bulk commodities. To complete this technical work, studies submitted by the applicants will be reviewed and a gap analysis completed. Additional field review and data collection, review, and analysis will be required. The analyses will be generally extended to areas beyond Washington State waters and out of state rail corridors based on the requirement that SEPA examine potential impacts that could affect adjoining areas. As noted in WAC 197-11-060(4)(b) and as supported in SEPA case law, SEPA review must be extended to examine whether impacts could affect the healthful environment of an adjoining area. Potentially significant unavoidable adverse impacts will be examined for areas that adjoin Washington State, as long as the impacts are likely and not merely speculative (WAC 197-11-060(4)(a)). The geographic scope of analysis was determined to include rail transportation corridors both in-state and out of state, and vessel transportation corridors beyond Washington State waters. Further discussion of the geographic scope can be found at <http://www.eisgatewaypacificwa.gov/sites/default/files/content/files/EIS-PressRelease-73113.pdf#overlay-context=resources/press-room>. As with discussion of the project site and associated transportation corridors, discussion will be of significant impacts.

A Health Impact Assessment (HIA) on the GPT proposal will also be part of the technical analyses to be included in Chapter 3. Health impacts associated with bulk commodity transportation and storage will be identified based on local, regional, and state health data, as well as technical data collected in the EIS process. Health-based impacts identified in the HIA will be incorporated in to Chapter 3 of the Draft EIS as appropriate.

#### PREPARATION OF DRAFT ENVIRONMENTAL IMPACT STATEMENT

This process step is discussed in Tasks 7 and 8 of the scope of work. This step includes refining information from other scope of work tasks into a final document and preparing the Draft EIS summary. The Draft EIS summary will be included Chapter 1 of the Draft EIS. Completion of the Draft EIS will close the present contracting phase.

#### FUTURE CONTRACT AMENDMENT – FINAL EIS

Public hearings per WAC 197-11-535 for commenting on Draft EIS and preparation of the Final EIS, including decisions on public and agency review of the Draft EIS, will be managed under a subsequent contract amendment. The Final EIS will, in addition to responses to comments received on the Draft EIS, include additions, corrections, and clarifications to the Draft EIS, including additional study, if required, to adequately respond to Draft EIS comments. This future contract amendment phase will culminate in completion and issuance of a Final EIS.

#### NEXT STEPS

##### PUBLIC DRAFT EIS REVIEW

Once the Draft EIS is completed and issued, a public comment period is initiated. Agencies, affected tribes, and the public may provide comment for a period of 30 days following the date of Draft EIS issuance. WAC

197-11-455(7) provides that, upon request, the lead agencies may grant an extension of up to 15 days to the comment period as long as the request is received during the initial 30 day comment period.

**FINAL EIS DEVELOPMENT AND BEYOND**

As described in the section under Future Contract Amendment, a Final EIS will be prepared that responds to comments on the Draft EIS. After release of the Draft EIS, Whatcom County staff will prepare a staff report for submittal to the Whatcom County Hearing Examiner. The Whatcom County Hearing Examiner will make a recommendation to the Whatcom County Council on the proposals, and the Whatcom County Council will be the ultimate decision-maker. Permit decisions by other agencies will follow the decision of the Whatcom County Council if the Council’s decision is to approve the proposals. More information on these next steps will be provided concurrent with Final EIS development.

**SEPA DRAFT EIS SCOPE OF ANALYSIS – ATTACHMENT A – ELEMENTS OF THE ENVIRONMENT**

ENVIRONMENTAL ELEMENT WAC 197-11-444	ENVIRONMENTAL ELEMENT SUBCATEGORY
<b>NATURAL ENVIRONMENT</b>	
Earth/Geology	<ul style="list-style-type: none"> <li>▪ Geology</li> <li>▪ Soils</li> <li>▪ Topography</li> <li>▪ Unique physical features</li> <li>▪ Erosion/enlargement of land area (accretion)</li> </ul>
Air	<ul style="list-style-type: none"> <li>▪ Air quality</li> <li>▪ Climate and climate change, including greenhouse gases</li> </ul>
Water	<ul style="list-style-type: none"> <li>▪ Surface water movement/quantity/quality</li> <li>▪ Runoff/absorption</li> <li>▪ Floods and floodplains</li> <li>▪ Groundwater movement/quantity/quality</li> <li>▪ Public water supplies</li> <li>▪ Wetlands</li> </ul>
Plants and Animals	<ul style="list-style-type: none"> <li>▪ Habitat for and numbers or diversity of species of plants, fish, or other wildlife</li> <li>▪ Unique species</li> <li>▪ Fish and wildlife migration routes</li> </ul>
Energy and Natural Resources	<ul style="list-style-type: none"> <li>▪ Amount required/rate of use/efficiency</li> <li>▪ Scenic resources</li> </ul>
<b>BUILT ENVIRONMENT</b>	
Environmental Health	<ul style="list-style-type: none"> <li>▪ Noise</li> <li>▪ Risk of explosion</li> <li>▪ Releases or potential releases to the environment affecting public health, such as toxic or hazardous materials</li> </ul>
Land and Shoreline Use	<ul style="list-style-type: none"> <li>▪ Land Uses, land use plans, and growth management, including relationship to existing land use plans and to estimated population</li> <li>▪ Light and glare</li> <li>▪ Aesthetics</li> <li>▪ Recreation</li> <li>▪ Historic and cultural preservation</li> <li>▪ Agricultural crops</li> </ul>
Transportation	<ul style="list-style-type: none"> <li>▪ Transportation systems</li> <li>▪ Vehicular traffic</li> <li>▪ Waterborne, rail traffic</li> <li>▪ Movement/circulation of people or goods</li> <li>▪ Traffic hazards</li> </ul>
Public Services and Utilities	<ul style="list-style-type: none"> <li>▪ Services, including fire, police, parks and other recreation facilities, maintenance, stormwater</li> <li>▪ Utilities including electricity, water, sewer, solid waste, other utilities</li> </ul>



**WAC 197-11-444: Elements of the Environment**

**Earth**

The earth element includes the primary review areas of geology/geologic hazards and physical oceanography/coastal processes.

For the project site and immediate vicinity:

- Primary topics to be analyzed for geology include geologic conditions, erosion potential, vibration-related instability, long term soil compaction/settling, spill/hazardous material impacts to site soils, and long term operational impacts to site soils/geologic conditions. In addition geologic impacts of climate change to the proposed site will be examined.
- Primary topics to be analyzed for physical oceanography/coastal processes include changes to coastal bluffs, beaches, nearshore areas, and related shoreline habitats, change related to upland facilities and proposed shoreline structures, propeller scour of bottom sediments or barge grounding during construction activities near the wharf and potential deposition areas for scoured sediment, sediment inputs from streams, including from run-off and slope erosion along streams/ditches, and alteration of water circulation and wave energy from ship mooring, vessel anchorage, ship wakes

For bulk commodity transportation, to the extent possible, vessel-related vibrational impacts on slope stability will be evaluated for vessel transit lanes within the geographic study area. Impacts from ship wakes along the shipping route will be analyzed based on projections of wake generated from ships and the wave energy reaching beaches during different tide stages to determine the potential for shoreline erosion. Train-related vibration information collected for the Noise and Vibration study will be used to determine the areas of highest slope stability risk along railway lines.

**Air**

The air element includes analysis of air quality, energy, and greenhouse gases (GHG).

For the site and immediate vicinity:

- Air quality analysis will include establishing baseline emissions levels for criteria pollutants and toxic air pollutants. Operation-based emissions, along with fugitive dust from terminal operations and cargo handling equipment will be analyzed and air dispersion modeling will be conducted.
- The GHG baseline will be established based on existing land use using quantification methods and associated emission factors for existing site use and surrounding industries. GHG production from proposed site activities to be calculated using established emission factors to include production from on-road mobile sources, non-road mobile sources, stationary combustion sources, and vehicular trips generated by the proposals. GHG production



associated with land use change and emissions from lost carbon storage will be included in the analysis, along with GHG production from off-site emissions produced for purchased electricity and associated energy usage. Analysis will consider the vulnerability of the proposal to a changing climate (changes to existing populations and habitats, erosion and landslide potential associated with elevated winter winds and precipitation, sea level rise, and increased flooding).

For bulk commodity transportation, vessel and train-generated emissions related to air quality will be modeled. For impacts of additional traffic congestion along the train route, emissions from both the trains and on-road traffic will be determined and modeled.

An evaluation of greenhouse gas emissions from rail and vessel traffic will be conducted. Analysis will consider the vulnerability of the vessel transit area to a changing climate primarily from data collected for other aspects of vessel transportation. An evaluation and disclosure of GHG of end-use coal combustion will also be completed.

### **Water**

The water element under SEPA includes analysis of surface water, ground water, water quality, water supply, and wetlands.

For the site and immediate vicinity:

- Primary topics to be analyzed for water resources include evaluation of stormwater runoff quality, the proposed stormwater system, discharge points, and discharge quality including runoff pattern changes; bulk commodity dust contribution to water quality degradation; floodplain fill/rise evaluation and quantification; groundwater discharge/recharge associated with project development and regional groundwater volume; potable, industrial, fire suppression water demands and analysis of ability to meet demands; drinking water quality; water quality change as a result of spills, chemical handling, or accident risk; and marine water quality (physical and chemical parameters) and circulation (water movement from various physical forces such as tides, wind) evaluation for the wharf/trestle.
- Wetlands, wetland buffers, and wetland functions will be analyzed, including alterations to hydrology; activity encroachment; invasive species dispersal into new areas by construction equipment, cars, and trains; effects of untreated or improperly treated runoff.

For bulk commodity transportation, water-based analysis will include the addition of marine water quality (physical and chemical parameters) and circulation (water movement from various physical forces such as tides, wind) evaluation for vessel transit areas; water quality changes from increased vessel traffic during routine operations and associated change to current patterns affecting erosion and deposition; bulk commodity (coal) contribution to water quality degradation; ballast water management; sediment re-suspension; fueling techniques; water quality changes that may result from chemical/product spills or accidents.

For rail traffic routes, water bodies, including wetlands and stream crossings, along routes will be catalogued. Evaluations will be based on stream categories to represent a range of effects. Air quality technical analysis describing composition, volume, rates, origin, and dispersal patterns of coal dust generated (including suppressant/surfactant chemicals) will be used to determine fate and effect on adjacent water bodies. These patterns will also be used to establish patterns of invasive species dispersal. Information from the oil spill/fate transport and hazards and risks, air quality, vibration analyses will inform this analysis.

### **Plants and Animals**

The Plants and Animals element includes the primary analysis areas of terrestrial habitats and species and aquatic habitats and species.

For the site and immediate vicinity:

- Primary topics to be analyzed for terrestrial habitats and species include loss (physical or functional) of terrestrial vegetation from site operation and maintenance; species or habitat change as a result of coal dust or surfactant introduction to soil/vegetation; invasive species dispersal into new areas by equipment, cars, or trains; community connectedness and corridor changes or blockages; habitat availability offsite to accommodate displaced wildlife; evaluation of change to biological diversity; noise, vibration, or lighting disturbance; and community composition or population change from toxics
- Primary topics to be analyzed for aquatic habitats and species include loss or physical degradation of habitat or aquatic vegetation due to fill, spills, or hydrologic changes; effects of coal dust (or other product dust) related to physical accumulation and potential toxicity; aquatic resources related to water quality or sediment quality degradation resulting from groundwater infiltration, stormwater inputs; potential change to habitats or populations from emissions, noise and vibration, lighting, or shade from overwater structures; competition, population loss, or habitat degradation from invasive species imported via ship, rail, or surface transportation; loss or physical degradation of habitat or aquatic vegetation due to pilings, shoreline substrate changes, sedimentation patterns, hydrologic changes, marine riparian vegetation removal, propeller scour, ship wakes, and/or spills; changes to the food web in terms of alteration of productivity, degradation, or availability as a result of site development and operations; behavioral disturbances as a result of the physical presence of facility and operations; stranding based on projected ship wakes using information on the number, speed, size, and draft of ships, beach bathymetry along the routes, and the animal community along the shorelines; aquatic noise and vibration levels associated with ship movement throughout time at dock and while moving through the shipping lanes from propellers, machinery, hull passage through water, and any sonar/depth sounder signals.

For water-borne bulk commodity transportation, analysis will include introduction of non-native invasive species on ships or in cargo, behavioral disturbances as a result of the physical presence of facility and

operations, stranding from ship wakes along shipping routes. As with the proposal, aquatic noise and vibration levels associated with ship movement throughout time at dock and while moving through the shipping lanes from propellers, machinery, hull passage through water, and any sonar/depth sounder signals will be analyzed.

For rail bulk commodity transportation, coal dust/surfactant, potential spills, and invasive species impacts will be analyzed. Impacts to wildlife movement, toxic substances collected on vegetation and ingested, noise and vibration, and coal dust collection on eggs will be analyzed.

### **Energy and Natural Resources**

The scoped element of “amount required” (WAC 197-11-444(1)e(i)) is included under the air element, as energy required is linked to usage and resulting potential significant adverse impacts to air quality and greenhouse gas production. The scoped element of “scenic resources” is included under the land use element of “aesthetics”.

### **Environmental Health**

The environmental health element includes analysis of noise and vibration, risk of explosion, and releases or potential releases to the environment affecting public health, such as toxic or hazardous materials.

For the site and immediate vicinity:

- Primary topics to be analyzed for noise and vibration include coal terminal operations and on-site train operations; noise from vessels docked or adjacent to the wharf; noise from additional train trips on the Custer Spur; and noise and vibration potentially affecting sensitive land uses.
- Primary topics to be analyzed for risk of explosion and release or potential release of toxic or hazardous materials include releasing and spreading contaminated soil, sediment, or groundwater; accidental hazardous materials spills or releases; types and quantities of construction and operation wastes and their likely treatment/disposal methods; potential risks and management provisions related to the accidental release of oil or toxic chemicals;
- Releases or potential releases to the environment affecting public health will be examined through development of a health impact assessment (HIA). Health impacts will be computed based on the prediction model(s) developed through the HIA process, baseline conditions, applied data, and expected changes in health risk factors.

For water-borne bulk commodity transportation, evaluations will include noise from vessels en route to and from the terminal site and offshore underwater noise from vessels en route to and from the terminal; fate and effects of oil spills in the marine environment of the Strait of Juan de Fuca, the Strait of Georgia, and surrounding waters; risks and management provisions related to normal ship operations and regular discharges including oil, ballast water, bilge water, tank washings (oily water), oily sludge, sewage (black water), garbage, and grey water; and risks and management provisions for

vessels docked or adjacent to the wharf including accidental releases, proximity of moving vessels, refueling activity at berths, navigational hazards.

For rail bulk commodity transportation, evaluations will include severe and moderate noise or vibration for historical and projected future train operations at locations where noise thresholds; the change in train traffic due to the project proposals to determine if there is vibration impact due to the additional trains; potential risks and management provisions related to the types and quantities of normal rail operational wastes and their likely treatment/disposal methods and associated environmental impacts.

### **Land Use**

The land use element includes analysis of land use, cultural resources, and aesthetics.

For the site and immediate vicinity:

- Primary topics to be analyzed for land use include conversions based on the proposal footprint; consistency with planning goals, policies, and strategies; land use impairment based on a review of the noise and vibration, air quality, and transportation analyses; and a determination on whether the activities, features, or attributes of adjacent lands (including shorelines (physical and visual access), walking and biking trails, fishing, shellfishing and recreational boating) would be substantially impaired.
- Primary topics to be evaluated for cultural resources include excavation into and grading of existing ground surfaces; installation of pilings and piers; ground preparation such as clearing and grubbing; staging and stockpiling activities; temporary visual effects; vibration caused during construction; operational impacts from coal dust and vibration.
- Primary topics to be evaluation for aesthetics include visual quality from site development and associated vegetation removal; secondary effects of site operation such as coal dust generation; induced lighting and glare from site development and operation, visual effects of wharf and pier development and operation; and visual effects of ships.

For water-borne bulk commodity transportation, the potential for land use impairment will be evaluated based on a review of the noise and vibration, air quality, and transportation analyses. Cultural resource topics to be evaluated include analysis of increased vessel traffic, such as erosion of coastal archaeological sites or visual effects on cultural landscapes. Aesthetics topics to be evaluated include prop-wash, wake erosion, visual effects, vibration, and materials spill events; induced lighting and glare from ship passage; visual character from increased number of ships.

For rail bulk commodity transportation, the potential for land use impairment will be based on noise and vibration, air quality, and transportation analyses and may be where train volumes would substantially increase, noise levels would substantially change, and at-grade crossing delays would substantially increase. Cultural resource topics include evaluation of historic buildings and structures, both individual and within historic districts; cultural landscapes; traditional cultural properties; and historic railroad

properties. Aesthetics topics to be evaluated include visual aspects of coal dust and bulk commodity spills; induced lighting and glare from additional trains operations; blocking important or protected views; visual character from additional trains operations.

### **Transportation**

The transportation element includes surface transportation, water-borne transportation, and rail transportation.

For the site and immediate vicinity:

- The primary topics to be analyzed for surface transportation include cataloguing roadway at-grade crossings in the Cherry Point area; identifying average daily traffic volumes, existing safety issues, distance to next crossing, type of community (rural, urban, or city), and whether there are nearby grade separations. Further assessment, including modeling will be based on impact potential for crossing delay, volumes, and safety.
- Water-borne transportation is included in a vessel traffic study now under preparation. This analysis, once complete, will be reviewed for possible data gaps and incorporated into the Draft EIS as directed by the Co-Lead agencies. The vessel traffic study will provide the basis for water-borne transportation-related basis for analysis for other elements of the environment.
- Rail transportation analysis will apply 2010 base rail traffic data and result in rail traffic growth projections through 2035. Once the growth projections are complete, additional assessments will be completed that will provide the basis for rail-related analyses for other elements of the environment. These assessments include road/rail conflicts at key locations along the rail route(s) forecast to include GPT coal trains within the state; locomotive fuel consumption that can be converted into a projection of diesel fuel emissions; and rail infrastructure capacity implications as a result of the forecast projections of train volume growth over the involved rail corridors/line segments.

### **Public Services and Utilities**

The primary topics to be analyzed for public services and utilities include demand on public services and utilities including schools, emergency services, local water, stormwater, electric, gas, and telecommunications utilities; and disruption or severance of public services. For bulk commodity transportation, both water-borne and rail, the demand on emergency services related to increased traffic will be analyzed.